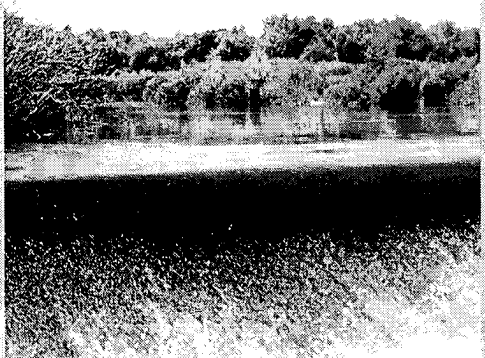


Las Vegas Valley NPDES Municipal Stormwater Discharge Permit

Annual Report 2011-2012



REGIONAL FLOOD
CONTROL DISTRICT



MWH

BUILDING A BETTER WORLD

September 2012

REGIONAL FLOOD CONTROL DISTRICT



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General Manager/Chief
Engineer

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City of Boulder City

September 21, 2012

Mr. Steve McGoff
State of Nevada
Bureau of Water Pollution Control
333 West Nye Lane, Room 129
Carson City, NV 89706-0851

RE: 2011-2012 NPDES ANNUAL REPORT

Dear Mr. McGoff:

Please find enclosed a copy of the 2011-2012 Annual Report for the Las Vegas Valley NPDES storm water discharge permit. This report was prepared by MWH and is hereby submitted for your use. The report details NPDES compliance activities for the period from July 1, 2011 through June 30, 2012. These activities were performed in accordance with Permit Number NV0021911 and the Storm Water Management Plan.

If you should have any questions, please do not hesitate to call.

Sincerely,

Kevin Eubanks, P.E., CFM
Assistant General Manager

Enclosure

KLE:sa

c: Regional Administrator
Environmental Protection Agency
75 Hawthorn Street
San Francisco, CA 94105

PA\Letters and Memos\NPDES\NPDES-11-12 transmit.docx

NPDES PERMIT NO. NV0021911

2011-2012 ANNUAL REPORT FOR

**LAS VEGAS VALLEY NPDES MUNICIPAL
STORMWATER DISCHARGE PERMIT**

Prepared for

LAS VEGAS VALLEY
STORMWATER QUALITY MANAGEMENT COMMITTEE

Clark County Regional Flood Control District
Clark County
City of Las Vegas
City of North Las Vegas
City of Henderson

Prepared by



MWH

BUILDING A BETTER WORLD

SEPTEMBER 2012

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Section 10

Industrial Facility Monitoring and Control Program

10.1 Permit Introduction

Industrial sites can be potential sources of urban stormwater pollution. Activities consisted of identifying industrial facilities that could be potential pollutant sources, conducting inspections of industrial facilities, and conducting an ongoing training program for local industrial site inspectors. The Industrial Facility Monitoring and Control Program provided Permittees with the appropriate training materials for individual site inspectors. This program is intended to complement the separate industrial site permitting program conducted by NDEP. This section identifies industrial facilities in the Las Vegas Valley that are specifically regulated under the MS4 permit.

10.2 Permit Requirements

Section *IV.H* of the 2010-2015 MS4 Permit for Las Vegas Valley includes requirements for an industrial facility monitoring and control program.

10.3 Best Management Practices

Section 10 of the SWMP describes the Industrial Facility Monitoring and Control Program adopted for Las Vegas Valley. **Table 10-1** summarizes the permit requirements and the BMPs that address those requirements. Descriptions of how the measures meet the specific permit requirements are provided in the following discussion.

Table 10-1

Industrial Facility Monitoring and Control Program for the Las Vegas Valley

MS4 Permit Section	MS4 Permit Requirements	Measures
IV.H.1.a	Identify priorities and procedures for inspections and establishing and implementing control measures for such discharges	SC-6 – Commercial/Industrial Housekeeping Practices SC-9 – Grease Interceptor Program SC-13 – Industrial Pretreatment Program SC-15 – Southern Nevada Health District Inspections SC-23 – Industrial Facility Stormwater Inspections SC-24 – Industrial Facility Stormwater Inventory SC-25 – Industrial Facility Stormwater Inspection Checklist SC-28 – Industrial Facility Inspector Training Workshops Site Design measures included in the New Development and Significant Redevelopment program of the SWMP Treatment Control measures included in the Watershed program of the SWMP.
IV.H.1.b	Each Permittee shall develop and maintain an inventory of the facilities identified in part IV.H.1. The inventory shall list the facilities by specific categories (e.g. restaurants, municipal maintenance yards, etc.) and list the minimum inspection frequency for each category of facilities.	SC-24 – Industrial Facility Stormwater Inventory
IV.H.1.c	Each Permittee shall provide a list of the inventoried facilities to NDEP by October 1, 2010. Each year thereafter for the life of this permit, each Permittee shall provide to NDEP by October 1 of that year, an updated list of the facilities inventoried during that year.	See Table 10-4
IV.H.1.d	Describe a monitoring program for stormwater discharges associated with the industrial facilities identified in this section, to be implemented during the term of the permit in accordance with the monitoring programs defined in Part V.A.	See Section 10.3.1.4 of the SWMP

Note: BMP Fact Sheets in the SWMP describe the BMP measures.

SC-6 Commercial/Industrial Housekeeping Practices

Commercial and industrial site operators apply good housekeeping practices in exterior areas such that stormwater runoff would not contact pollutant sources and contribute a substantial load of pollution to the MS4. In addition, municipal codes for each of the entities require that all activities and operations at industrial sites and commercial sites where hazardous materials and chemicals are used be conducted in and contained in enclosed structures. Permittees promote good commercial / industrial site maintenance by providing site owners with information posted on www.lvstormwater.com.

SC-9 Grease Interceptor Program

Entities have existing ordinances requiring proper removal and disposal of grease from grease traps in restaurants and industrial facilities. Clogged grease traps could allow wastewater to be directed to the MS4. Public wastewater treatment service providers inspect over 2,000 restaurants and industrial facilities each year. Best practices are employed consistently among each of the entities in Las Vegas Valley. The Permittees addressed this BMP by completing the following actions:

- The COH inspected 209 grease interceptors.
- The CLV inspected 50 grease interceptors.
- The CNLV inspected 52 grease interceptors.
- Clark County inspected 1,868 grease/sand-oil interceptors.

SC-13 Industrial Pretreatment Program

Permittees have industrial pretreatment programs associated with their wastewater systems. All new qualifying industrial sites would have to comply with the industrial pretreatment project and would be subject to regular pretreatment inspections. This BMP is reported separately under each of the Permittees' NPDES permit.

SC-15 Southern Nevada Health District Inspections

SNHD performs inspections of commercial and industrial sites that are “conditionally exempt generators of hazardous waste”(CESQG). These are smaller facilities that do not fall under the State’s hazardous materials regulations. SNHD will expand its inspection program to any new industrial facilities that meet the definition of conditionally exempt generators of hazardous waste. SNHD sets the policies and procedures to comply with the BMP. In the fiscal year 2012, the SNHD performed 3,301 waste management audits on CESQG facilities, and 300 target sector inspections under a contract with NDEP.

Industrial Facilities. The MS4 permit specifically identifies four classes of industrial facilities for which a program has been developed. These four categories are discussed in the following section. In addition to identifying these facilities, the program includes of complying with BMP SC-23, SC-24, SC-25, and SC-28.

Inspected Facilities. The EPA regulates and maintains a list of industrial and other facilities that release certain amounts of regulated chemicals into the environment. The EPA’s website (www.epa.gov/enviro/facts/tri/search.html) was used to search for and list all Toxic Release Inventory (TRI) facilities in Clark County. A total of 74 facilities were found. This list was compiled by the EPA based on reporting by regulated industries and

therefore may be incomplete. NDEP agreed that this was a reasonable source of information for this purpose. EPA classifies facilities by Standard Industrial Classification (SIC) and North American Industry Classification System (NAICS) codes. It was confirmed by the Permittees that some facilities listed on the EPA website as industrial facilities subject to Section 313 were not inspected due to facility shutdown, a change in operational process, or the lot being empty. The facilities that are subject to Section 313 in the Las Vegas Valley are shown in **Table 10-2**. Facilities that are listed on the EPA website that did not require stormwater inspections (as described previously) are indicated with a footnote in **Table 10-2**; these facilities are not included in the inventory of industrial facilities for the 2012-2013 permit year (see SC-24).

Using the street addresses or the latitude and longitude provided in the EPA database, a map was created using GIS software to display the location of these facilities (see **Figure 10-1**). Efforts were made to verify facility locations; however, some inaccuracies may be present. Facilities that are not in operation, no longer exist, or for which stormwater inspections were not necessary due to facility process change are not shown on **Figure 10-1**.

Municipal Landfills. The Apex Regional Landfill is currently the only active local landfill in the Las Vegas area, but is located outside of the Las Vegas Wash Watershed. As a result, no municipal landfills are covered under the MS4 industrial program requirements since there are no active municipal landfills in the Las Vegas Wash drainage area.

Hazardous Waste Treatment, Disposal, and Recovery Facilities. The EPA keeps a list of hazardous waste treatment, disposal, and recovery facilities that are subject to the Resource Conservation and Recovery Act (RCRA). The EPA RCRA Info web site (www.epa.gov/enviro/html/rcris/rcris_query.html) was searched to find hazardous waste treatment and disposal facilities within Clark County. The search returned four facilities that are covered by the MS4 permit or that have a written determination on file and are all within the Las Vegas Valley. The hazardous waste treatment, disposal, and recovery facilities covered by the permit are listed below. The locations of these facilities are identified on the map in **Figure 10-1**.

- Safety Kleen Systems Incorporated
4582 Donovan Way
North Las Vegas, NV 89031

Table 10-2

Industrial Facilities Subject to Section 313 in the Las Vegas Valley ^a

Facility Name	Facility Address	SIC Code(s)	NAICS Code(s) ^b	Latitude	Longitude	Jurisdiction
Good Humor Corp	1001 Olsen Street Henderson, NV 89015	2024	311520	36.076667	-114.953889	City of Henderson
Las Vegas Paving	Eastgate Road and Capehorn Drive Henderson, NV 89015	2951	324121	36.06008	-115.020056	City of Henderson
Monierfifetile LLC	430 Eastgate Road Henderson, NV 89015	3272	327390	36.057973	-115.019816	City of Henderson
Silver State Materials	450 Eastgate Road Henderson, NV 89014	3273	327320	36.058796	-115.019485	City of Henderson
Thatcher Co. of Nevada	850 W. Lake Mead Drive Henderson, NV 89014	2819	325188	36.033547	-115.014811	City of Henderson
Pacific Engineering & Production Co. of Nevada ^c	8291 Gibson Road Henderson, NV 89015	2819	333999	36.083704	-115.028818	City of Henderson
Nevada Ready Mix ^c	2200 Bowes St. Henderson, NV 89044	3273	327320	35.96592	-115.16315	City of Henderson
Rinker Materials Henderson #1854 ^c	750 Cape Horn Henderson, NV 89015	3273	327320	36.060115	-115.026307	City of Henderson
Rinker Materials (CEMEX) Anthem Plant 1856 ^c	2403 Democracy Henderson, NV 89044	3273	327320	35.927837	-115.092348	City of Henderson
Ocean Spray Cranberries Inc. ^d	1301 American Pacific Drive Henderson, NV 89014-8806	2086	311421	36.041663	-115.041816	City of Henderson
Poly-West ^d	251 Conestoga Way Henderson, NV 89002	3081, 5541	326113	35.996553	-114.940411	City of Henderson
Anderson Dairy	801 Searles Avenue Las Vegas, NV 89101	2026	311511	36.185542	-115.185542	City of Las Vegas
Las Vegas Finishing LLC	3261 Builders Avenue Las Vegas, NV 89101	3471	332813	36.160838	-115.102666	City of Las Vegas
Nevada Ready Mix	601 W. Bonanza Road Las Vegas, NV 89106	2024	327320	36.176733	-115.149921	City of Las Vegas
Southern Nevada Paving (DBA Bardon Materials) Summerlin Asphalt Plant	Summerlin Parkway and Interstate 215 Las Vegas, NV 89145	2951	324121	36.173889	-115.338055	City of Las Vegas
Las Vegas Paving ^c	W. Lone Mountain Road Las Vegas, NV 89129	2951	324121	36.248239	-115.290579	City of Las Vegas
Rinker Materials (CEMEX) Kyle Canyon Plant #1866 ^c	2645 Moccasin Road Las Vegas, NV 89143	3273	327320	36.335901	-115.299186	City of Las Vegas
Sparkletts Water Systems Aqua Vend ^c	3140 Polaris #10 Las Vegas, NV 89102	7389	562112	36.132363	-115.186761	City of Las Vegas
Washington Group International ^c	4610 N. Grand Canyon Drive Las Vegas, NV 89129	3273	327320	36.244527	-115.306248	City of Las Vegas
Haycock Petroleum	715 W Bonanza Road Las Vegas, Nevada 89106		424710			City of Las Vegas

Table 10-2 (Continued)

Industrial Facilities Subject to Section 313 in the Las Vegas Valley ^a

Facility Name	Facility Address	SIC Code(s)	NAICS Code(s) ^b	Latitude	Longitude	Jurisdiction
Bardon Materials Gowan Asphalt	413 E. Gowan Road North Las Vegas, NV 89030	2951	324121	36.224037	-115.136283	City of North Las Vegas
Capital Cabinet Corp ^c	3645 Losee Road North Las Vegas, NV 89030	2434	337110	36.226334	-115.122129	City of North Las Vegas
Firestone Building Products	4272 Corporate Center Dr North Las Vegas, NV 89030	3081	326113	36.237413	-115.101955	City of North Las Vegas
Jensen Precast	3853 Losee Road North Las Vegas, NV 89030	3272	327390	36.230622	-115.119221	City of North Las Vegas
Las Vegas Paving	3400 N. 5th Street North Las Vegas, NV 89030	2951	324121	36.221982	-115.133945	City of North Las Vegas
Maxum Petroleum North Las Vegas Facility	4581 Eaker Street North Las Vegas, NV 89081	5171	424710	36.243654	-115.081279	City of North Las Vegas
Meadow Gold Dairies	6350 E. Centennial Parkway North Las Vegas, NV 89115	2026	311511	36.277361	-115.032861	City of North Las Vegas
Metl-Span I LTD	4700 Engineering Way, Suite 103 North Las Vegas, NV 89031		332311	36.247294	-115.100153	City of North Las Vegas
CEMEX Gowan Plant #1860	29 W Gowan North Las Vegas, NV 89030	3273	327320	36.22406	-115.139724	City of North Las Vegas
American Eagle Ready Mix North Las Vegas #1853	4001 Losee Road North Las Vegas, NV 89030	3273	327320	36.232849	-115.117878	City of North Las Vegas
Cal Portland North Gowan Plan (Previously Silver State Materials)	143 W. Gowan Road North Las Vegas, NV 89030	3273	327320	36.224446	-115.141998	City of North Las Vegas
Cal Portland	Range Road North Las Vegas, NV 89115	3273	327320	36.267764	-115.058916	City of North Las Vegas
Thermo Fluids Inc. Antifreeze Services	4000 Arcata Way North Las Vegas, NV 89030	2899	325998	36.232253	-115.120567	City of North Las Vegas
Universal Urethane Inc.	4201 E. Lone Mountain Road North Las Vegas, NV 89030	3086	326150	36.246517	-115.082199	City of North Las Vegas
HD Supply Construction Supply (WC0059)	2829 Losee Road North Las Vegas, NV 89030	3449	332312	36.204285	-115.137004	City of North Las Vegas
Custom Building Products	3115 E Lone Mountain Road Suite 100 North Las Vegas, NV 89081	7216, 1311	327999, 211111			City of North Las Vegas
GE Transportation Locomotive Combo Unit	5406 El Campo Grande Ave North Las Vegas, NV 89115		336510, 33651			City of North Las Vegas
Nitrex Inc	201 E Mayflower Ave North Las Vegas, NV 89030		332811			City of North Las Vegas
Artesian Spas (May Manufacturing LLC)	4720 N Lamb Boulevard Las Vegas, NV 89115	3088	326191	36.246056	-115.079876	Clark County
CMC Economy Steel	4265 W. Tompkins Ave Las Vegas, NV 89103	N/A	332312	36.104564	-115.1917136	Clark County

Table 10-2 (Continued)

Industrial Facilities Subject to Section 313 in the Las Vegas Valley ^a

Facility Name	Facility Address	SIC Code(s)	NAICS Code(s) ^b	Latitude	Longitude	Jurisdiction
Ergon Asphalt Products Inc. Las Vegas	6400 W. Richmar Avenue Las Vegas, NV 89118	2951, 5171	324121	36.017815	-115.231728	Clark County
Ergon Asphalt Products Inc. Las Vegas (Previously Semmaterials LP)	3901 W Ponderosa Way Las Vegas, NV 89118	2951, 5172	324121	36.080197	-115.191628	Clark County
Grand Products Nevada Inc	751 Pilot Road, Suite A Las Vegas, NV 89119	3679, 3672	335999	36.063886	-115.147003	Clark County
Haycock Petroleum	4825 N Sloan Road Las Vegas, NV 89115	N/A	424710	N/A	N/A	Clark County
IGT	6811 Spencer Street Las Vegas, NV 89119	3699	335999	36.065704	-115.128802	Clark County
Kalco Lighting LLC	6355 S Windy Street, Suite 3 Las Vegas, NV 89119	2514, 3645, 3646	335122	36.073503	-115.177728	Clark County
Ken's Foods Inc. Las Vegas	8925 Ken's Court Las Vegas, NV 89123	N/A	311941	36.02898	-115.223037	Clark County
Las Vegas Paving	9325 S. Jones Boulevard Las Vegas, NV 89119	2951	324121	36.020286	-115.225743	Clark County
Las Vegas Paving ^c	6600 Speedway Boulevard Las Vegas, NV 89115	2951	324121	36.277044	-115.014241	Clark County
Nevada Ready Mix Arville	4301 W. Hacienda Las Vegas, NV 89109	3273	327320	36.093096	-115.196243	Clark County
Rebel Oil Co. Inc.	5054 N. Sloan Lane Las Vegas, NV 89115	5171	424710	36.252471	-115.042431	Clark County
Saguaro Power Co.	435 Fourth St Henderson, NV 89015	N/A	221112	36.174829	-115.140984	Clark County
Service Rock Products Inc. 4th Street	8350 4th Street Henderson, NV 89015	3273	327320	36.036893	-115.006163	Clark County
Service Rock Products Inc. Lone Mountain NV Facility	10815 W. Washburn Las Vegas, NV 89149	3273	327320	36.255602	-115.287204	Clark County
Sparkletts Drinking Water Corp.	4225 W. Desert Inn Road Las Vegas, NV 89102	2086	31211	36.129134	-115.196282	Clark County
Timet (Titanium Metals Corp)	8000 W. Lake Mead Parkway, Gate 3 Henderson, NV 89015	3339	331419	36.0396	-114.992798	Clark County
URS Corporation (Washington Group International)	811 Grier Dr. Suite A Las Vegas, NV 89119	3273	327320	N/A	N/A	Clark County
Young Electric Sign Co.	5119 S. Cameron Street Las Vegas, NV 89118	3993	811121	36.096323	-115.204936	Clark County
Casino Ready Mix ^c	5355 N. Beesley Drive Las Vegas, NV 89115	3273	327320	36.257685	-115.039304	Clark County
CEMEX MGM City Center ^c	3790 Las Vegas Blvd So Las Vegas, NV 89109	3273	327320	36.101401	-115.173744	Clark County

Table 10-2 (Continued)

Industrial Facilities Subject to Section 313 in the Las Vegas Valley ^a

Facility Name	Facility Address	SIC Code(s)	NAICS Code(s) ^b	Latitude	Longitude	Jurisdiction
Cemex-Blue Diamond Plant #1855 ^c	9325 S. Jones Blvd Las Vegas, NV 89119	3273	327320	36.01876	-115.22566	Clark County
Las Vegas Cultured Marble Inc. ^c	6875 Speedway Boulevard, Building U-102 Las Vegas, NV 89115	3087	325991	36.2794	-115.020593	Clark County
Las Vegas Paving ^c	0.75 Miles West of I-15 & 1.5 Miles SW of US 95 Las Vegas, NV 89115	2951	324121	36.2834	-115.02472	Clark County
Las Vegas Paving ^c	1.5 Miles N. of Hollywood and Las Vegas Blvd Las Vegas, NV 89115	2951	324121	N/A	N/A	Clark County
Lighthouse VIP Products ^c	4601 E. Cheyenne Ave. Las Vegas, NV 89115	2851	325510	36.217065	-115.073382	Clark County
MCC Uniflex LLC ^c	1151 Grier Dr Las Vegas, NV 89119-3711	2754	323111	36.067156	-115.138662	Clark County
Nevada Ready Mix Echelon ^c	2920 S. Industrial Rd Las Vegas, NV 89109	2024	327320	36.136116	-115.165336	Clark County
Nevada Ready Mix Le Reve ^c	Sands and Las Vegas Blvd. S. Las Vegas, NV 89109	3273	327320	36.125352	-115.169222	Clark County
Nevada Ready Mix Plant 9 ^c	8755 W. Sunset Las Vegas, NV 89123	3273, 2951	324121, 327320	36.071764	-115.192291	Clark County
Rinker Materials (CEMEX) ^c Blue Diamond 1894	9275 S. Jones Boulevard Las Vegas, NV 89139	3273	327320	36.021086	-115.226308	Clark County
Rinker Materials (CEMEX) ^c Turnberry Plant	2777 Paradise Road Las Vegas, NV 89109	3273	327320	36.138264	-115.155489	Clark County
Rinker Materials-Buffalo Main #1850 ^c	4511 S. Buffalo Road Las Vegas, NV 89147	3273	327320	36.106908	-115.261	Clark County
Service Rock Products Inc. Las Vegas ^c	800 Feet S. of Intersection of Cactus Road and Pollock Drive Las Vegas, NV 89102	3273	327320	35.995833	-115.143611	Clark County
Spartan of Nevada Inc. ^c	2441 W. Desert Inn Road Las Vegas, NV 89109	3079, 3088	326191	36.129636	-115.176143	Clark County

Notes:

^a Data on EPA website was not verified. Historically, many businesses listed on the EPA website no longer exist, as the data is not regularly purged.^b Starting with Reporting Period Year 2006, TRI Facilities began reporting NAICS codes, instead of SIC codes, to identify their Primary Business Activities.^c Facility not operational or no longer exists. Not shown on Figure 10-1.^d Stormwater inspections not necessary due to facility process change. Not shown on Figure 10-1.^e The address listed on the EPA website indicates facility is in Clark County. Inspection in the 2010-2011 permit year determined facility is in the City of North Las Vegas. Jurisdiction is updated in the inventory of industrial facilities for the 2011-2012 permit year.

- Tronox LLC
(DBA Kerr – McGee Chemical Corporation)
8000 Lake Mead Parkway
Henderson, NV 89015
- Pioneer Americas LLC
(DBA Olin Chlor Alkali Products)
8000 Lake Mead Parkway
Henderson, NV 89015

The MS4 Permittees have not identified any facilities other than those already identified in the above categories that are contributing a substantial pollutant loading to the municipal storm sewer system. It is important to note that many industrial facilities, in addition to those listed above, are being inspected.

This section completes the requirement to identify industrial facilities subject to Section 313 of SARA Title III; municipal landfills; hazardous waste treatment, and disposal facilities; and other industrial facilities determined by the Permittees to be potential sources of substantial pollutant loading. The inventory of regulated industrial sites was used by the Permittees in developing their industrial site inspection and management programs. The industrial pretreatment program staff that conduct the industrial inspections for the MS4 program already routinely inspect these facilities. No special inspection requirements have been adopted for these facilities.

SC-23 Industrial Facility Stormwater Inspections

Each MS4 Permittee has developed an industrial facility monitoring and control program as required by the Las Vegas MS4 NPDES Permit. **Table 10-3** lists the industrial facility inspections performed by each of the Permittees in the 2011-2012 permit year. Documentation of the inspections performed by the Permittees is provided in **Appendix I**.

Because industrial site inspectors are conducting other types of inspections for other regulatory programs (e.g. pretreatment inspections, stormwater complaints, illicit discharge and detection inspections), many industrial sites will be inspected that do not fit into one of the four categories of which inspections are required. Lists of sites that are inspected but do not fit in one of the four covered categories will not be provided, but a total number of industrial site inspections performed is included.

Clark County. Clark County conducted 158 industrial stormwater inspections. Of the 158 site 24 of the industrial stormwater inspections were completed that are categorized as

SARA Section 313 and RCRA hazardous waste treatment and recovery facilities **Table 10-3** shows the location and results of the 24 SARA and RCRA industrial stormwater inspections. The BMI Complex is a Clark County island within the COH boundaries that contains heavy industrial sites. Facilities within the BMI complex are inspected annually by Clark County. COH Building and Fire Safety inspectors are being integrated into the MS4 industrial inspection program, and have the authority to inspect the BMI Complex perimeter for illegal discharges. The BMI complex has an individual stormwater permit with the State and monitors and reports any violations to NDEP. Nonetheless, NDEP has indicated that the local entities must conduct their own industrial site stormwater inspections.

Clark County reported in August, 2011, that they are inspecting 140-160 industrial sites per year to determine if the sites could be in “category 4” (other sites potentially contributing significant pollutant loads to the MS4). They have limited staff working on the MS4 program and will have to expand their staff if NDSR BMP inspections are required. Clark County is wrestling with how to provide adequate staff and budget resources for MS4 obligations and other water quality planning and management activities.

City of Henderson. The COH Building and Fire Safety – Fire Safety Division currently inspects at least annually the sites identified on the SARA Section 313 list, as well as those identified with a potential to discharge a substantial pollutant load to the MS4; **Table 10-3** lists these inspections that were conducted. Additional industrial facilities were inspected for stormwater purposes, which were not required by the stormwater permit (these additional facilities are not listed in **Table 10-2**). A total of 79 industrial sites were in COH’s inspection program.

Inspectors identify and inspect facilities identified by the COH as potential substantial contributors of pollutants to the MS4. The identification of facilities, inspection procedures, and enforcement of the industrial inspection program is based on the hazardous materials requirements in the 2006 International Fire Code.

City of Las Vegas. The CLV inspected 6 existing facilities identified by Section 313 of Title III of SARA. No stormwater issues were found during the inspections. Inspections pertaining to stormwater were conducted by the Environmental Compliance Section during normal inspections for compliance with non-domestic discharges to the sanitary sewer. **Table 10-3** lists these inspections that were conducted.

A total of 22 stormwater inspections were performed at Class I permitted facilities during the course of routine Environmental Compliance Section wastewater inspections and 54 stormwater inspections were performed at Class II permitted facilities during the course of

Table 10-3

Summary of 2011-2012 Industrial Site Inspections

Jurisdiction	Location	Date	Results / Violations	Action Taken	Follow-Up Action
Clark County	Cemex Sloan Plant #1863	4/20/2012	Pass	None Required	None
	CMC Economy Steel	7/29/2011	Pass	None Required	None
	Ergon Asphalt & Emulsions Inc. (Richmar)	4/20/2012	Pass	None Required	None
	Ergon Asphalt & Emulsions, Inc. (Ponderosa) - Formerly Semmaterials LP Las Vegas	1/25/2012	Pass / Receive No Exposure Exclusion from NDEP	None Required	None
	Grand Products Nevada Inc	7/29/2011	Pass	None Required	None
	H2O Environmental (New) H2O Environmental (Old Location) H2O Environmental (Old Location)	10/26/2011 1/31/2012 4/19/2012	Corrections Needed Site Closed Pass	Corrective Action Ordered Site Closed None	12/1/2011 No No
	Haycock Petroleum	10/18/2011	Pass	None Required	None
	IGT	11/22/2012	Pass	None Required	None
	Kalco Lighting LLC	7/29/2011	Pass	None Required	None
	Ken's Foods Inc Las Vegas	7/29/2011	Minor Corrections	Corrective Action Ordered	Next Inspection
	Las Vegas Paving, S. Jones	8/31/2011	Minor Corrections	Corrective Action Ordered	Next Inspection
	May Manufacturing LLC (DBA Artesian Spas)	7/29/2011	Minor Corrections	Corrective Action Ordered	Next Inspection
	Nevada Ready Mix Arville	12/15/2011	Minor Corrections	Corrective Action Ordered	Next Inspection
	Olin - Pioneer	11/10/2011	Minor Corrections	Corrective Action Ordered	Next Inspection
	Phillips	11/17/2011	Pass	None Required	None

Table 10-3 (Continued)

Summary of 2011-2012 Industrial Site Inspections

Jurisdiction	Location	Date	Results / Violations	Action Taken	Follow-Up Action
Clark County	Pro Petroleum Inc	11/30/2011	Pass	None Required	None
	Rebel Oil Co Inc	10/18/2011	Minor Corrections	Corrective Action Ordered	Next Inspection
	Saguaro Power Co	11/10/2011	Pass	None Required	None
	Service Rock Products Inc - 4th Street	8/31/2011	Minor Corrections	Corrective Action Ordered	Next Inspection
	Service Rock Products Inc - Lone Mountain NV Facility	8/31/2011	Minor Corrections	Corrective Action Ordered	Next Inspection
	Sparkletts Drinking Water Corp	10/26/2011	Pass	None Required	None
	Titanium Metals Corporation (Timet)	11/16/2011	Minor Corrections	Corrective Action Ordered	None
	Tronox LLC	11/2/2011	Minor Corrections	Corrective Action Ordered	Next Inspection
	Young Electric Sign Co	11/22/2011	Minor Corrections	Corrective Action Ordered	Next Inspection
City of Las Vegas	Anderson Dairy	10/20/2011	Pass	None Required	None
		3/22/2012	Pass	None Required	None
		4/12/2012	Pass	None Required	None
		6/13/2012	Pass	None Required	None
	Las Vegas Finishing LLC	12/20/2011	Pass	None Required	None
		6/13/2012	Pass	None Required	None
		6/26/2012	Pass	None Required	None
	Las Vegas Paving (West Lone Mountain Road)	6/13/2012	Pass	None Required	None
	Nevada Ready Mix	6/13/2012	Pass	None Required	None
	Southern Nevada Paving dba Bardon Materials	6/13/2012	Pass/Facility shut down	None Required	None
	Haycock Petroleum	6/13/2012	Pass	None Required	None

Table 10-3 (Continued)

Summary of 2011-2012 Industrial Site Inspections

Jurisdiction	Location	Date	Results / Violations	Action Taken	Follow-Up Action
15 City of North Las Vegas	Bardon Materials Gowan Asphalt	4/4/2012	Passed	None Required	None
	Maxum Petroleum	3/20/2012	Passed	None Required	None
	Masterbran Cabinets (Previously Capital Cabinet Corp)	4/5/2012	Passed	None Required	None
	Firestone Building Products	5/10/2012	Passed	None Required	None
	Jensen Precast	4/5/2012	Passed	None Required	None
	Las Vegas Paving	3/19/2012	Passed	None Required	None
	Meadow Gold Dairies	5/7/2012	Passed	None Required	None
	Metl-Span I LTD	5/24/2012	Passed	None Required	None
	American Eagle Ready Mix North Las Vegas (Previously Cemex #1860)	4/17/2012	Passed	None Required	None
	CEMEX Gowan Plant #1853	4/3/2012	Passed	None Required	None
	Safety Kleen System	3/22/2012	Passed	None Required	None
	Cal Portland Range Plant	4/19/2012	Passed	None Required	None
	Cal Portland North Gowan Plant	4/17/2012	Passed	None Required	None
	Thermo Fluids Inc. Antifreeze Services	3/13/2012	Passed	None Required	None
	Universal Urethane Inc.	3/20/2012	Passed	None Required	None

Table 10-3 (Continued)

Summary of 2011-2012 Industrial Site Inspections

Jurisdiction	Location	Date	Results / Violations	Action Taken	Follow-Up Action
City of Henderson	Ahern Rentals	12/7/2011	Pass	None Required	None
	Auto Tech	10/20/2011	Pass	None Required	None
	Black Mountain Golf & Country Club	8/9/2011	Pass	None Required	None
	Chapman Chrysler Jeep Llc	10/13/2011	Pass	None Required	None
	Desert BMW of Henderson	8/9/2011	Pass	None Required	None
	Duaine's Automotive Inc.	6/19/2012	Pass	None Required	None
	Expert Transmissions Inc	8/31/2011	Pass	None Required	None
	Findlay Volkswagen	6/20/2012	Pass	None Required	None
	Good Humor- Breyers Ice Cream	12/7/2011	Pass	None Required	None
	Green Valley Collision Center	7/5/2011	Pass	None Required	None
	Green Valley Ranch Station Casinos	3/14/2012	Pass	None Required	None
	Henderson Hyundai Superstore	4/16/2012	Pass	None Required	None
	Las Vegas Paving	11/21/2011	Pass	None Required	None
	MonierLifetile LLC	8/29/2011	Pass	None Required	None
	Ocean Spray Cranberries	2/3/2012	Pass	None Required	None
	Calportland Co. (Previously Silver State Materials)	11/8/2012	Pass	None Required	None
	Solera at Anthem	7/27/2011	Pass	None Required	None

Table 10-3 (Continued)

Summary of 2011-2012 Industrial Site Inspections

Jurisdiction	Location	Date	Results / Violations	Action Taken	Follow-Up Action
City of Henderson	Star Nursery Inc	7/29/2011	Pass	None Required	None
	Sun City Anthem Golf Maintenance Shop	4/25/2012	Pass	None Required	None
	Sun City Macdonald Ranch - Golf Maint	3/14/2012	Pass	None Required	None
	Thatcher Co. of Nevada	-	No Information Provided		

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routine Environmental Compliance Section wastewater inspections. The Class I inspections and Class II inspections are not listed in **Table 10-3**

City of North Las Vegas. The CNLV pretreatment inspectors performed a total of 832 stormwater inspections associated with their normal inspections for compliance with regulations for discharges to the sanitary sewer system. Additional industrial facilities were inspected for stormwater purposes, which were not required by the stormwater permit. **Table 10-2** lists only the inspections that were conducted specifically for the stormwater permit. All stormwater issues identified were satisfactorily resolved. The Permittees addressed this BMP by completing the following actions:

SC-24 Industrial Facility Stormwater Inventory

Table 10-4 lists the inventory of facilities and the frequency of inspection that will be inspected during the 2012-2013 permit year. This list is reviewed every year and submitted to NDEP.

SC-25 Industrial Facility Stormwater Inspection Checklist

The Permittees have developed a standard checklist to be used by inspectors to conduct industrial site inspections. Each entity may modify the standard checklist slightly to meet its needs. However, the general information collected during inspections by each entity will be similar. The basic information on the inspection form includes:

- name, type of industry, location, jurisdiction and contact person of facility
- date of the inspection and name of inspector
- evidence of any non-stormwater discharges (e.g., process water, wastewater)
- evidence of any violations of local stormwater ordinances
- any actions taken or required in the future

The Permittees filed completed Industrial Site Inspection Checklists chronologically in a separate stormwater compliance file. For facilities that hold pretreatment permits, the Permittees may have also filed copies of the Industrial Site Inspection Checklists in the respective permit files.

SC-28 Industrial Facility Inspector Training Workshops

The Permittees train new inspectors utilizing a presentation that includes a description of the Las Vegas MS4 NPDES Permit and the Las Vegas Valley SWMP, a description of the local ordinances and the Industrial Facility Monitoring and Control Plans. New inspectors are provided contact information, such as names and phone numbers for Permittees and other interested parties. Each Permittee currently has the following number of industrial inspectors that were trained prior to the 2011-2012 permit year.

- Clark County has 3 trained industrial inspectors
- The CNLV has 8 trained industrial inspectors
- The CLV has 3 trained industrial inspectors.
- The COH has 5 trained industrial inspectors.

Inspector training sessions are performed on an as-needed basis by each of the Permittees to provide updated information on any changes in the industrial stormwater inspection program. If changes have not occurred, then re-training would not be necessary. There were no significant industrial program changes in the 2011-2012 permit year, so no new training of inspectors was needed.

10.4 Monitoring, Tracking and Measurable Goals

The Permittees propose to monitor and track certain key elements of the Industrial Facility Monitoring and Control Program, and report progress annually in the *Annual Report*. These elements are shown in **Table 10-5**. In addition, **Table 10-5** lists measurable goals proposed for the Industrial Facility Monitoring and Control Program. Most goals are numerical and measurable; where this was not possible, narrative goals are proposed.

Goals for existing activities are the same goals that have been part of the previous SWMP for the past several years or through the regional implementation entity. The levels of the existing programs have been effective in managing impacts of the specified industrial facilities on the MS4.

Table 10-4

Inventory of Industrial Facilities and Inspection Frequency for 2012-2013 Permit Year

Type of Industrial Facility	Facility Name	SIC Code(s)	NAICS Code(s)	Facility Address	Jurisdiction	Minimum Frequency of Inspection
Section 313 of SARA	Calportland Co Henderson Plant	3273	327320	450 Eastgate Rd Henderson, NV 89014	City of Henderson	Once Annually
	Good Humor Corp	2024	311520	1001 Olsen St Henderson, NV 89011	City of Henderson	Once Annually
	Las Vegas Paving Corp	2951	324121	Eastgate Rd & Cape Horn Dr Henderson, NV 89015	City of Henderson	Once Annually
	Monierlifetile LLC	3272	327390	430 Eastgate Rd Henderson, NV 89015	City of Henderson	Once Annually
	Thatcher Co Of Nevada	2819	325188	850 W. Lake Mead Drive Henderson, NV 89014	City of Henderson	Once Annually
Section 313 of SARA	Anderson Dairy	2026	311511	801 Searles Ave Las Vegas, NV 89101-1131	City of Las Vegas	Once Annually
	Haycock Petroleum	5171	424710	715 W Bonanza Rd Las Vegas, NV 89106	City of Las Vegas	Once Annually
	Las Vegas Finishing LLC	3471	332813	3261 Builders Ave Las Vegas, NV 89101	City of Las Vegas	Once Annually
	Nevada Ready Mix Bonanza	2024	327320	601 W Bonanza Rd Las Vegas, NV 89106	City of Las Vegas	Once Annually
	Southern Nevada Paving Summerlin Asphalt Plant	2951	324121	Summeirin Pkwy & I-215 Las Vegas, NV 89145	City of Las Vegas	Once Annually

Table 10-4 (Continued)

Inventory of Industrial Facilities and Inspection Frequency for 2012-2013 Permit Year

Type of Industrial Facility	Facility Name	SIC Code(s)	NAICS Code(s)	Facility Address	Jurisdiction	Minimum Frequency of Inspection
Section 313 of SARA	Bardon Materials Gowan Asphalt	2951	324121	413 E Gowan Rd North Las Vegas, NV 89030	City of North Las Vegas	Once Annually
	Cal Portland Range Plant	3273	327320	5910 Range Rd Las Vegas, NV 89115	City of North Las Vegas	Once Annually
	Cal Portland North Gowan Plant (Previously Silver State)	3273	327320	143 W Gowan Rd North Las Vegas, NV 89032	City of North Las Vegas	Once Annually
	Custom Building Products	7216, 1311	327999	3115 E Lone Mountain Rd Suite 1000 North Las Vegas, NV 89081	City of North Las Vegas	Once Annually
	Firestone Building Products	3081	326113	4272 Corporate Center Dr North Las Vegas, NV 89030	City of North Las Vegas	Once Annually
	HD Supply Construction Supply Ltd (NV011-6158)	3449	332312	2829 Losee Rd North Las Vegas, NV 89030	City of North Las Vegas	Once Annually
	Jensen Precast	3272	327390	3853 Losee Rd North Las Vegas, NV 89030	City of North Las Vegas	Once Annually
	Las Vegas Paving Corp	2951	324121	3400 N 5th St North Las Vegas, NV 89030	City of North Las Vegas	Once Annually
	Las Vegas Paving ^a	2951	324121	6600 Speedway Boulevard Las Vegas, NV 89115	City of North Las Vegas	Once Annually
	Maxum Petroleum - North Las Vegas Facility	5171	424710	4581 Eaker St North Las Vegas, NV 89081	City of North Las Vegas	Once Annually
	Meadow Gold Dairies	2026	311511	6350 E Centennial Pkwy North Las Vegas, NV 89115	City of North Las Vegas	Once Annually
	Metl-Span LLC	3448	332311	4700 Engineers Way Suite 103 North Las Vegas, NV 89081-2664	City of North Las Vegas	Once Annually
	Nitrex Inc	3398	332811	201 E Mayflower Ave North Las Vegas, NV 89030	City of North Las Vegas	Once Annually
	Pabco Gypsum	N/A	327420	4001 State Hwy 147 North Las Vegas, NV 89115	City of North Las Vegas	Once Annually
	Cemex North Las Vegas #1853	3273	327320	29 W Gowan North Las Vegas, NV 89030	City of North Las Vegas	Once Annually
	American Eagle Ready Mix North Las Vegas	3273	327320	4001 N Losee North Las Vegas, NV 89030	City of North Las Vegas	Once Annually
	Thermo Fluids Inc Antifreeze Services	2899	325998	4000 Arcata Way North Las Vegas, NV 89030	City of North Las Vegas	Once Annually
	Universal Urethane Inc	3086	326150	4201 E Lone Mountain Rd North Las Vegas, NV 89081	City of North Las Vegas	Once Annually
	Ge Transportation Locomotive Combo Unit	N/A	336510, 33651, 061111	5406 E El Campo Grande Ave North Las Vegas, NV 89115	City of North Las Vegas	Once Annually

Table 10-4 (Continued)

Inventory of Industrial Facilities and Inspection Frequency for 2012-2013 Permit Year

Type of Industrial Facility	Facility Name	SIC Code(s)	NAICS Code(s)	Facility Address	Jurisdiction	Minimum Frequency of Inspection
Section 313 of SARA	May Manufacturing LLC (Dba Artesian Spas)	3088	326191	4720 N Lamb Blvd Las Vegas, NV 89115	Clark County	Once Annually
	CMC Economy Steel	N/A	332312	4265 W Tompkins Ave Las Vegas, NV 89103	Clark County	Once Annually
	Ergon Asphalt Inc. Las Vegas (Semmaterials, L.P.)	5171, 2951	324121	3901 W Ponderosa Way Las Vegas, NV 89118	Clark County	Once Annually
	Ergon Asphalt & Emulsions Inc Las Vegas	2951, 5171	324121	6400 W Richmar Ave Las Vegas, NV 89139	Clark County	Once Annually
	Grand Products Nevada Inc	3679, 3672	335999	751 Pilot Rd Suite A Las Vegas, NV 89119	Clark County	Once Annually
	Haycock Petroleum	N/A	424710	4825 N Sloan Ln Las Vegas, NV 89115	Clark County	Once Annually
	IGT	3699	335999	6811 Spencer St Las Vegas, NV 89119	Clark County	Once Annually
	Kalco Lighting LLC	2514, 3645, 3646	335122	6355 S Windy St Suite 3 Las Vegas, NV 89119	Clark County	Once Annually
	Ken's Foods Inc Las Vegas	N/A	311941	8925 Ken's Ct Las Vegas, NV 89123	Clark County	Once Annually
	Las Vegas Paving Corp	2951	324121	9325 S Jones Blvd Las Vegas, NV 89119	Clark County	Once Annually
	Nevada Ready Mix Arville	3273	327320	4301 W Hacienda Las Vegas, NV 89109	Clark County	Once Annually
	Pro Petroleum Inc	N/A	424710	4985 N Sloan Ln Las Vegas, NV 89115	Clark County	Once Annually
	Rebel Oil Co Inc	5171	424710	5054 No Sloan Ln Las Vegas, NV 891151900	Clark County	Once Annually
	Saguaro Power Co	N/A	221112	435 Fourth St Henderson, NV 89015	Clark County	Once Annually
	Service Rock Products Inc - 4th Street	3273	327320	8350 4th St Henderson, NV 89015	Clark County	Once Annually
	Service Rock Products Inc - Lone Mountain Nv Facility	3273	327310	10815 W Washburn Las Vegas, NV 89149	Clark County	Once Annually
	Sparkletts Drinking Water Corp	2086	31211	4225 W Desert Inn Rd Las Vegas, NV 89102	Clark County	Once Annually
	Timet (Titanium Metals Corp.)	3339	331419	181 N Water St Henderson, NV 89015	Clark County	Once Annually
	Young Electric Sign Co.	3993	811121, 325320	5119 S Cameron St Las Vegas, NV 89118	Clark County	Once Annually

Table 10-4 (Continued)

Inventory of Industrial Facilities and Inspection Frequency for 2012-2013 Permit Year

Type of Industrial Facility	Facility Name	SIC Code(s)	NAICS Code(s)	Facility Address	Jurisdiction	Minimum Frequency of Inspection
Hazardous Waste Treatment, Disposal and Recovery	Safety-Kleen Systems (708701)	2891, 4212, 5039, 7389, 4213	562910, 325520, 562112, 484220, 484230, 423390	4582 Donovan Way North Las Vegas, NV 89081	City of North Las Vegas	Once Annually
	Olin Chlor Alkali Products (Pioneer Americas LLC)	2812, 2813, 2819	325181	8000 W. Lake Mead Parkway, Henderson, NV 89015	Clark County	Once Annually
	Tronox LLC	2819	325188	8000 W. Lake Mead Parkway Henderson, NV 89015	Clark County	Once Annually
Landfills	None In Las Vegas Valley					
Other Industrial Facilities that are Contributing a Substantial Pollutant Loading	None In Las Vegas Valley					

Notes:

* The address listed on the EPA website indicates facility is in Clark County. Inspection in 2010-2011 permit year determined facility is in the City of North Las Vegas.

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Section 10 – Industrial Facility Monitoring and Control Program

Table 10-5

Industrial Facility Program Responsible Parties, Monitoring, Tracking, and Measurable Goals

Best Management Practice	Responsible Parties	Monitoring and Tracking Information	Measurable Goals	Activities	Completed
SC-6 – Commercial/Industrial Housekeeping Practices	Clark County CLV CNLV COH Private Owners	Reported under SC-23 Industrial Facility Stormwater Inspections	Promote good housekeeping practices	Promote maintenance and housekeeping practices on new commercial/industrial sites to prevent contact of rain water with potentially contaminated surfaces and materials and/or control site runoff.	X
SC-9 – Grease Interceptor Program	Clark County CLV CNLV COH	Number of grease interceptor inspections	Minimize sanitary sewer system overflows	Public wastewater treatment service providers inspected grease interceptors for restaurants and industrial facilities	X
SC-13 – Industrial Pretreatment Program	Clark County CLV CNLV COH	Reported separately under NPDES discharge program individual permits.	Wastewater is properly discharged to sanitary sewer	Permittees have a pretreatment program which includes regulations on the types of materials that can be discharged to the wastewater collection system, as well as regular facility inspections to assure compliance with the program.	X
SC-15 – Southern Nevada Health District Inspections	SNHD	SNHD set policies and procedures; will not report for MS4 permit	Per SNHD policies and procedures	SNHD performs inspections of commercial and industrial sites that are "conditionally exempt generators of hazardous waste".	X
SC-23 – Industrial Facility Stormwater Inspections	Clark County CLV CNLV COH	Record the number of inspections conducted by Permittees annually and the number of follow-up actions that were required annually.	Conduct Inspections – annually by June 30	The Permittees completed industrial stormwater inspections	X

Table 10-5 (Continued)

Industrial Facility Program Responsible Parties, Monitoring, Tracking, and Measurable Goals

Best Management Practice	Responsible Parties	Monitoring and Tracking Information	Measurable Goals	Activities	Completed
SC-24 – Industrial Facility Stormwater Inventory	Clark County CLV CNLV COH	Update inventory annually	Develop the inventory of facilities to be inspected Update inventory annually	Permittees provide to NDEP a list of industrial facilities to be inspected. Pertinent inventories of covered industrial sites are updated at least annually by each Permittee.	X
SC-25 – Industrial Facility Stormwater Inspection Checklist	Clark County CLV CNLV COH	Develop checklist and update annually as necessary	Update checklist as needed	The Permittees have developed a standard checklist to be used by inspectors to conduct industrial site inspections.	X
SC-28 – Industrial Facility Inspector Training Workshops	Clark County CLV CNLV COH	Number of Inspectors trained annually	Checklist in <i>annual report</i>	Inspector training sessions were performed on an as-needed basis by each of the Permittees.	X

10.5 Implementation Schedule

Table 10-6 presents the implementation schedule for the proposed Industrial Facility Monitoring and Control Program measures. All of the components of the Industrial Facility Monitoring and Control Program are now fully implemented.

Table 10-6

**Implementation Schedule for Industrial Facility Monitoring
and Control Program Measures**

Best Management Practice	Required Implementation Activities and Time Period after SWMP Approval	Status of Implementation Activities
SC-6 – Commercial/Industrial Housekeeping Practices	Existing Practice	Complete
SC-9 – Grease Interceptor Program	Existing Practice	Complete
SC-13 – Industrial Pretreatment Program	Existing Practice	Complete
SC-15 – Southern Nevada Health District Inspections	Existing Practice	Complete
SC-23 – Industrial Facility Stormwater Inspections	Existing Practice	Complete
SC-24 – Industrial Facility Stormwater Inventory	Existing Practice	Complete
SC-25 – Industrial Facility Stormwater Inspection Checklist	Existing Practice	Complete
SC-28 – Industrial Facility Inspector Training Workshop	12 months	Complete

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10 INDUSTRIAL FACILITY MONITORING AND CONTROL PROGRAM

This section presents proposed measures and practices to monitor and control pollutants in stormwater discharges to MS4s from certain industrial facilities in Las Vegas Valley.

10.1 Permit Requirements

Section IV.H of the 2010-2015 MS4 Permit for Las Vegas Valley includes the following requirements for an industrial facility monitoring and control program:

IV.H.1 The updated SWMP shall include a description of a program to monitor and control pollutants in stormwater discharges to MS4s from municipal landfills, hazardous waste treatment, disposal and recovery facilities, industrial facilities that are subject to section 313 of title III of the Superfund Amendments and Reauthorization Act of 1986 ("SARA"), and industrial facilities that the municipal permit applicant determines are contributing a substantial pollutant loading to the MS4. The program shall include the following components:

IV.H.1.a Identify priorities and procedures for inspections and establishing and implementing control measures for such discharges;

IV.H.1.b Each Permittee shall develop and maintain an inventory of the facilities identified in part IV.H.1. The inventory shall list the facilities by specific categories (e.g. restaurants, municipal maintenance yards, etc.) and list the minimum inspection frequency for each category of facilities;

IV.H.1.c Each Permittee shall provide a list of the inventoried facilities to NDEP by October 1, 2010. Each year thereafter for the life of this permit, each Permittee shall provide to NDEP by October 1 of that year, an updated list of the facilities inventoried during that year; and

IV.H.1.d Describe a monitoring program for stormwater discharges associated with the industrial facilities identified in this section, to be implemented during the term of the permit in accordance with the monitoring programs defined in Part V.A.

10.2 Program Development

The Industrial Facility Monitoring and Control Program (Industrial Program) was developed by first reviewing existing practices performed by the Permittees that monitor and control pollutants in stormwater discharges to MS4s from specific industrial facilities listed in the permit. These practices may be implemented specifically for the MS4 permit program, or may be implemented primarily to meet other community objectives. In either case, they are considered part of the overall Industrial Program. New measures were then identified, if needed, to meet the specific program requirements as outlined in the permit.

The Industrial Program includes BMPs that fit within the pollution prevention, onsite controls, and treatment control portions of the overall SWMP management plan framework depicted in **Figure 3-9**. The measures to accomplish this goal could be structural or non-structural.

10.3 Proposed Best Management Practices

Table 10-1 lists the proposed BMPs for the Industrial Program. The status of the proposed BMPs are shown in the final column of **Table 10-1**, to indicate whether the BMP is an existing program, existing program with planned enhancements based on the MS4 permit renewal, or new program that is a result of the MS4 permit renewal. Descriptions of each BMP are provided in **Appendix B**.

Table 10-2 lists the Industrial Program permit elements and the proposed BMPs. Discussion of how the proposed measures meet each of the permit requirements for the Industrial Program are provided in the following subsections.

Table 10-1. Proposed BMPs for Industrial Facility Monitoring and Control Program

Measure Type	ID No.	Proposed BMP	Status
Source Control	SC-6	Commercial/Industrial Housekeeping Practices	Existing Program
Source Control	SC-9	Grease Interceptor Program	Existing Program
Source Control	SC-13	Industrial Pretreatment Program	Existing Program Enhancement
Source Control	SC-15	Southern Nevada Health District Inspections	Existing Program
Source Control	SC-23	Industrial Facility Stormwater Inspections	Existing Program
Source Control	SC-24	Industrial Facility Stormwater Inventory	New Program
Source Control	SC-25	Industrial Facility Stormwater Inspection Checklist	New Program
Source Control	SC-28	Industrial Facility Inspector Training Workshops	Existing Program

Table 10-2. Industrial Facility Monitoring and Control Program for the Las Vegas Valley

MS4 Permit Section	MS4 Permit Requirements	Proposed Measures
IV.H.1.a	Identify priorities and procedures for inspections and establishing and implementing control measures for such discharges	SC-6 – Commercial/Industrial Housekeeping Practices SC-9 – Grease Interceptor Program SC-13 – Industrial Pretreatment Program SC-15 – Southern Nevada Health District Inspections SC-23 – Industrial Facility Stormwater Inspections SC-24 – Industrial Facility Stormwater Inventory SC-25 – Industrial Facility Stormwater Inspection Checklist SC-28 – Industrial Facility Inspector Training Workshops Site Design measures included in the New Development and Significant Redevelopment program of the SWMP Treatment Control measures included in the Watershed program of the SWMP.
IV.H.1.b	Each permittee shall develop and maintain an inventory of the facilities identified in part IV.H.1. The inventory shall list the facilities by specific categories (e.g. restaurants, municipal maintenance yards, etc.) and list the minimum inspection frequency for each category of facilities.	SC-24 – Industrial Facility Stormwater Inventory
IV.H.1.c	Each Permittee shall provide a list of the inventoried facilities to NDEP by October 1, 2010. Each year thereafter for the life of this permit, each Permittee shall provide to NDEP by October 1 of that year, an updated list of the facilities inventoried during that year.	To be included in Annual Report
IV.H.1.d	Describe a monitoring program for stormwater discharges associated with the industrial facilities identified in this section, to be implemented during the term of the permit in accordance with the monitoring programs defined in Part V.A.	See Section 10.3.1.4

10.3.1 Permit Section IV.H.1 – Industrial Facility Program

The MS4 Permit requires the Permittees to develop a program to monitor and control pollutants in stormwater discharges to MS4s from:

- Municipal landfills
- Hazardous waste treatment, disposal and recovery facilities
- Industrial facilities that are subject to section 313 of title III of the Superfund Amendments and Reauthorization Act of 1986 ("SARA"), and
- Industrial facilities that the municipal permit applicant determines are contributing a substantial pollutant loading to the MS4.

The program addresses the following specific permit requirements, which are described in the following subsections:

- Identify priorities and procedures for inspections and establishing and implementing control measures for such discharges
- Develop and maintain an inventory of industrial facilities identified in this section
- Provide a list of the inventoried facilities to NDEP by October 1 of each permit year
- Describe a monitoring program for stormwater discharges associated with the industrial facilities identified in this section

10.3.1.1 Permit Section IV.H.1a – Industrial Facility Inspections and BMPs

The MS4 Permit requires the Permittees to identify priorities and procedures for inspections and establishing and implementing control measures for such discharges. The local Industrial Program complements the State's general industrial stormwater permit program and consists of control measures to reduce the potential for industrial sites to contribute significant pollutant loadings to the MS4. The proposed Industrial Program consists of the following elements:

- SC-6 Commercial/Industrial Housekeeping Practices. Promote maintenance and housekeeping practices on new commercial/industrial sites to prevent contact of rain water with potentially contaminated surfaces and materials and/or control site runoff. Commercial and industrial site operators are required to apply good housekeeping practices in exterior areas such that stormwater runoff would not contact pollutant sources and contribute a substantial load of pollution to the MS4. In addition municipal codes for each of the entities require that all activities and operations at industrial sites and commercial sites where hazardous materials and chemicals are used be conducted in and contained in enclosed structures. This includes gas stations (with the exception of fueling areas), vehicle repair shops, and manufacturing facilities. Code requirements will apply to these types of facilities in all new developments. Locating work areas indoors at new industrial sites will prevent pollutant contact with rain or runoff.
- SC-9 Grease Interceptor Program. Entities have existing ordinances requiring proper removal and disposal of grease from grease traps in restaurants and industrial facilities. Clogged grease traps could allow wastewater to be directed to the MS4. Las Vegas Valley experiences about 100,000 visitors per day, and combined with 1.8 million residents, there are hundreds of thousands of potential diners each day. Public wastewater treatment service providers inspect over 2,000 restaurants and industrial facilities each year. Best practices are employed consistently among each of the entities in Las Vegas Valley.
- SC-13 Industrial Pretreatment Program. Permittees have industrial pretreatment programs associated with their wastewater systems. The pretreatment program includes regulations on the types of materials that can be discharged to the wastewater collection system, as well as regular facility inspections to assure compliance with the program. All new qualifying industrial sites would have to

comply with the industrial pretreatment project and would be subject to regular pretreatment inspections.

- SC-15 Southern Nevada Health District Inspections. SNHD performs inspections of commercial and industrial sites that are “conditionally exempt generators of hazardous waste.” These are smaller facilities that do not fall under the State’s hazardous materials regulations. Inspections assure that no illicit discharges have occurred or could potentially occur, and check for secondary containment for hazardous materials. SNHD will expand its inspection program to any new industrial facilities that meet the definition of conditionally exempt generators of hazardous waste.
- SC-23 Industrial Facility Stormwater Inspections. The proposed industrial facility inspection process is similar to existing practices. The proposed inspection processes are described for each entity as follows:
 - Clark County staff inspect sites identified on the Superfund Amendments and Reauthorization Act of 1986 (SARA) Section 313 list, select industrial sites to determine if they have the potential to discharge a substantial pollutant load, and those identified with a potential to discharge a substantial pollutant load to the MS4 at least annually.
 - CLV and CNLV use their pretreatment program staff to conduct stormwater inspections during their regular site visits. All industrial sites in the pretreatment program are inspected. If issues pertaining to stormwater are discovered during normal inspections for compliance with discharges to the sanitary sewer, these are noted and addressed accordingly.
 - The CoH Building and Fire Safety Department fire safety inspectors identify and inspect facilities identified by the CoH as potential substantial contributors of pollutants to the MS4. The identification of facilities, inspection procedures, and enforcement of the industrial inspection program is based on the hazardous materials requirements in the 2006 International Fire Code.

Inspector training sessions are performed on an as-needed basis by each of the Permittees. Training materials for industrial facility inspectors are developed and will be updated annually as necessary. The training presentation includes a description of the Las Vegas MS4 NPDES Permit and the Las Vegas Valley SWMP. The local ordinances and the Industrial Facility Monitoring and Control Plans for each jurisdiction are described. Contact information, such as names and phone numbers for Permittees and other interested parties were given for the inspectors’ information. Training materials have been updated and customized to individual entities as needed.

The general procedures of the inspections are reported by each of the Permittees in the annual report. The items reported include name and location of facility, date of the inspection, results and/or violations that are inspected, any actions taken, and any follow-up actions taken.

- SC-24 Industrial Facility Stormwater Inventory. Permittees will provide to NDEP a list of industrial facilities to be inspected. This list will be provided in the MS4 Annual Report. Pertinent inventories of covered industrial sites will be updated at

least annually by each Permittee. Because industrial site inspectors are conducting other types of inspections for other regulatory programs (e.g., pretreatment inspections, stormwater complaints, illicit discharge and detection inspections), many industrial sites will be inspected that do not fit into one of the four categories for which inspections are required. Lists of sites that are inspected but do not fit one of the four covered categories will not be provided, but a total number of industrial site inspections performed will be included in the Annual Report.

- SC-25 Industrial Facility Stormwater Inspection Checklist. The Permittees have developed a standard checklist to be used by inspectors to conduct industrial site inspections. Each entity may modify the standard checklist slightly to meet its needs. However, the general information collected during inspections by each entity will be similar. The basic information on the inspection form includes:
 - name, type of industry, location, jurisdiction and contact person of facility
 - date of the inspection and name of inspector
 - evidence of any non-stormwater discharges (e.g., process water, wastewater)
 - evidence of any violations of local stormwater ordinances
 - any actions taken or required in the future

The Permittees will file completed Industrial Site Inspection Checklists chronologically in a separate stormwater compliance file. For facilities that hold pretreatment permits, the Permittees may also file copies of the Industrial Site Inspection Checklists in the respective permit files.

- SC-28 Industrial Facility Inspector Training Workshops. Inspector training sessions are performed on an as-needed basis by each of the Permittees. Training materials for industrial facility inspectors are developed and will be updated annually as necessary. The training presentation includes a description of the Las Vegas MS4 NPDES Permit and the Las Vegas Valley SWMP. The local ordinances and the Industrial Facility Monitoring and Control Plans for each jurisdiction are described. Contact information, such as names and phone numbers for Permittees and other interested parties were given for the inspectors' information. Training materials have been updated and customized to individual entities as needed.
- The Spill Control Prevention Plan BMP (SC-12) included in the Illicit Discharge Detection program of the SWMP primarily addresses industrial sites.

10.3.1.2 Permit Section IV.H.1.b – Inventory of Facilities

The MS4 permit Section *IV.H.1* specifically identifies four classes of industrial facilities for which a program to monitor and control pollutants must be developed. These classes of industrial facilities, along with the proposed method of developing an inventory of these facilities, are described below.

Industrial Facilities Subject to Section 313 of Title II of SARA

The permit identifies industrial facilities that are subject to Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA). The EPA regulates and keeps a list of

industrial and other facilities that are subject to Section 313 that release certain amounts of regulated chemicals into the environment. The EPA's website

(www.epa.gov/enviro/html/tris/tris_query.html)

will be used to search for and list all Toxic Release Inventory (TRI) facilities in Clark County. The Permittees will execute a geography search to identify all Section 313 facilities located within Clark County. The Permittees will then manually identify facilities located within their jurisdiction from the Clark County list. The EPA list has been found to be outdated in the past. Listings will be verified to assure the businesses are still active.

Municipal Landfills

The permit also identifies municipal landfills. There are no active municipal landfills in the Las Vegas Valley MS4 Permit area. Sunrise Landfill is a closed landfill within the Las Vegas Valley MS4 permit area. Entities are currently working with Republic Services, EPA and BLM on a closure process for the landfill. The closure plan design includes a complete cap, channels and retention basins to prevent downstream stormwater effects.

Hazardous Waste Treatment, Disposal and Recovery Facilities

Drain inlets and catch basins collect sediment, trash, debris, and other pollutants that have washed off streets and other paved surfaces. One of their functions is to keep this material out of the downstream storm drain system. The Permittees inspect and, as needed, remove sediment, debris and trash from storm drain inlets and catch basins in the public MS4 system. The permit identifies hazardous waste treatment, disposal and recovery facilities. The EPA keeps a list of hazardous waste treatment, disposal, and recovery facilities that are subject to the Resource Conservation and Recovery Act (RCRA). The EPA RCRA Info web site

(www.epa.gov/enviro/html/rcris/rcris_query.html)

will be searched to find hazardous waste treatment and disposal facilities within Las Vegas Valley. The Permittees will execute a geography search to identify all facilities subject to RCRA located within Clark County. Similar to the Section 313 facilities search, the Permittees will then manually identify facilities location within their jurisdiction from the Clark County list. The EPA list has been found to be outdated in the past. Listings will be verified to assure the businesses are still active.

Other Facilities Identified by Permittees

The final category is industrial facilities that the municipal permit applicant determines are contributing a substantial pollutant loading to the municipal storm sewer system. This category of facilities will be identified through Permittee inspections of facilities identified in illicit discharge and detection inspections, pretreatment inspections, stormwater complaints, and agency referrals. Note that CLV, CNLV and CoH combine stormwater inspections with industrial pretreatment inspections and fire safety inspections. Clark County uses a combination of business license data,

and water and sewer use data to identify facilities that should be inspected to determine if they are contributing a substantial pollutant loading to the municipal storm sewer system. As a result, a large number of sites are inspected that the Permittees have determined to not contribute a substantial pollutant loading to the MS4.

10.3.1.3 Permit Section IV.H.1.c – List of Inventoried Facilities

Section IV.H.1.c of the MS4 Permit requires that the Permittees provide to NDEP a list of industrial facilities to be inspected. This list will be provided in the MS4 Annual Report. Pertinent inventories of covered industrial sites will be updated at least annually by each Permittee.

Because industrial site inspectors are conducting other types of inspections for other regulatory programs (e.g., pretreatment inspections, stormwater complaints, illicit discharge and detection inspections), many industrial sites will be inspected that do not fit into one of the four categories for which inspections are required. A total number of industrial site inspections performed will be included in the Annual Report; however, lists of sites that are inspected but do not fit into one of the four covered categories will not be provided.

10.3.1.4 Monitoring Program for Industrial Facilities

Section IV.H.1.d of the MS4 Permit requires that the Permittees develop a monitoring program for stormwater discharges associated with the industrial facilities. Monitoring of discharges from certain industrial sites is currently required by other NPDES point-source discharge permits. The Permittees propose to perform monitoring of stormwater discharges from industrial sites under the MS4 Permit authority only under the following conditions:

- Stormwater discharge monitoring is not already required under another permit;
- Stormwater discharges are demonstrated to contribute a significant pollutant load to the MS4;
- Inadequate stormwater BMPs are in place; and
- The site owner has demonstrated an unwillingness to comply with industrial BMP requirements and stormwater monitoring is required to support local enforcement actions.

No stormwater monitoring of industrial sites is currently required based on these conditions.

10.4 Responsibility for Implementation

Table 10-3 shows the entity responsible for implementing each proposed BMP. In most cases the local entities (Clark County, CLV, CNLV and CoH) are responsible for providing staff, equipment and other financial resources to implement the measures. Regional activities common to all Permittees are sometimes the responsibility of CCRFCD (e.g., public outreach and education), and sometimes the responsibility of others.

Table 10-3. Industrial Program Responsible Parties, Monitoring and Tracking, and Measurable Goals

Best Management Practice	Responsible Parties	Monitoring and Tracking Information	Measurable Goals
SC-6 – Commercial/Industrial Housekeeping Practices	Clark County CLV CNLV CoH Private Owners	Reported under SC-23 Industrial Facility Stormwater Inspections	Promote good housekeeping practices
SC-9 – Grease Interceptor Program	Clark County CLV CNLV CoH	Number of grease interceptor inspections	Minimize sanitary sewer system overflows
SC-13 – Industrial Pretreatment Program	Clark County CLV CNLV CoH	Reported separately under NPDES discharge program individual permits.	Wastewater is properly discharged to sanitary sewer
SC-15 – Southern Nevada Health District Inspections	SNHD	SNHD set policies and procedures; will not report for MS4 permit	Per SNHD policies and procedures
SC-23 – Industrial Facility Stormwater Inspections	Clark County CLV CNLV CoH	Number of inspections conducted by Permittees annually Number of follow-up actions that were required annually	Conduct Inspections – annually by June 30
SC-24 – Industrial Facility Stormwater Inventory	Clark County CLV CNLV CoH	Update inventory annually	Develop the inventory of facilities to be inspected Update inventory annually
SC-25 – Industrial Facility Stormwater Inspection Checklist	Clark County CLV CNLV CoH	Develop checklist and update annually as necessary	Update checklist as needed
SC-28 – Industrial Facility Inspector Training Workshops	Clark County CLV CNLV CoH	Number of Inspectors trained annually	Checklist in annual report

10.5 Monitoring and Tracking

The Permittees propose to monitor and track certain key elements of the Industrial Facility Monitoring and Control Program, and report progress annually in the Annual Report. These elements are shown in **Table 10-3**.

10.6 Measurable Goals

Table 10-3 lists measurable goals proposed for the Industrial Facility Monitoring and Control Program. Most goals are numerical and measurable; where this was not possible, narrative goals are proposed.

Goals for existing activities are the same goals that have been part of the previous SWMP for the past several years or through the regional implementation entity. The levels of the existing programs have been effective in managing impacts of the specified industrial facilities on the MS4.

10.7 Implementation Schedule

Table 10-4 presents the implementation schedule for the proposed Industrial Facility Monitoring and Control Program measures. Most of the measures are existing activities that are being continuously implemented by the Permittees. In accordance with the requirement of the new MS4 permit, all program measures will be fully implemented within two years of approval of the SWMP by NDEP.

Table 10-4. Implementation Schedule for Industrial Facility Monitoring and Control Program Measures

Best Management Practice	Required Implementation Activities and Time Period after SWMP Approval
SC-6 – Commercial/Industrial Housekeeping Practices	Existing Practice
SC-9 – Grease Interceptor Program	Existing Practice
SC-13 – Industrial Pretreatment Program	Existing Practice
SC-15 – Southern Nevada Health District Inspections	Existing Practice
SC-23 – Industrial Facility Stormwater Inspections	Existing Practice
SC-24 – Industrial Facility Stormwater Inventory	Existing Practice
SC-25 – Industrial Facility Stormwater Inspection Checklist	Existing Practice
SC-28 – Industrial Facility Inspector Training Workshop	12 months

11 CONSTRUCTION SITE PROGRAM

This section presents a description of a program to implement and maintain structural and non-structural BMPs to reduce pollutants in stormwater runoff from construction sites to the MS4.

11.1 Permit Requirements

Section IV.I of the MS4 Permit for Las Vegas Valley includes the following requirements relative to a Construction Site BMP Program to reduce pollutants in stormwater runoff from construction sites to the MS4:

IV.I.1 The updated SWMP shall include a description of a program to implement and maintain structural and non-structural BMPs to reduce pollutants in stormwater runoff from construction sites to the MS4, which shall include:

IV.I.1.a A description of procedures for notifying developers and operators of properties of one (1) acre or more (and less than one acre if part of a larger plan of development) of requirements applicable to stormwater runoff;

IV.I.1.b A description of nonstructural and structural BMPs to be utilized for construction sites;

IV.I.1.c A description of appropriate educational and training measures for construction site operators; and

IV.I.1.d A description of a procedure to check for coverage under NDEP's General Construction Permit for Construction Activity prior to permit issuance.

Section IV.J of the MS4 Permit for Las Vegas Valley includes the following requirements relative to Inspection of Construction Sites in order to verify compliance with local ordinances and permits, and implementation/enforcement of follow-up actions necessary to comply with these renewal requirements.

IV.J.1 Each permittee shall conduct construction site inspections for compliance with its local ordinances (grading, stormwater, etc.) and permits (construction, grading, etc.);

IV.J.2 Each permittee shall inspect at least monthly, all construction sites within its jurisdiction meeting the following criteria:

IV.J.2.a All sites disturbing 100 acres or more in size at one time;

IV.J.2.b All sites disturbing one (1) acre or more that are tributary to a CWA section 303(d) water body segment impaired for sediment or turbidity; and

IV.J.2.c Sites determined by the Permittees as a significant threat to water quality. In evaluating threat to water quality, the following factors shall be considered:

- IV.J.2.c.i Soil erosion potential;*
- IV.J.2.c.ii Site slope;*
- IV.J.2.c.iii Project size and type;*
- IV.J.2.c.iv Sensitivity of receiving water bodies;*
- IV.J.2.c.v Proximity to receiving water bodies;*
- IV.J.2.c.vi Proximity to water bodies 303(d) listed for turbidity and sediment;*
- IV.J.2.c.vii Non-stormwater discharges;*
- IV.J.2.c.viii Past record of non-compliance by the construction site operators; and*
- IV.J.2.c.ix Any other relevant factors.*
- IV.J.2.d All other construction sites of > one (1) acre not listed in Part IV.J.2 shall be inspected at least two (2) times for the duration of ground disturbance activities;*
- IV.J.3 Based upon site inspection findings, each permittee shall implement all follow-up actions (i.e., re-inspection or enforcement) necessary to comply with this Permit;*
- IV.J.4 Inspections of construction sites shall include, but not be limited to:*
 - IV.J.4.a Assessment of compliance with Permittee ordinances and permits related to urban runoff, including the implementation and maintenance of designated minimum BMPs;*
 - IV.J.4.b Assessment of BMP effectiveness;*
 - IV.J.4.c Visual observations for non-stormwater discharges and potential illicit connections;*
 - IV.J.4.d Education and outreach on stormwater pollution prevention, as needed; and*
 - IV.J.4.e Creation of a written or electronic inspection report.*
- IV.J.5 The Permittees shall track the number of inspections for the inventoried construction sites throughout the reporting period to verify that the sites are inspected at the minimum frequencies required. This information shall be included in the Annual Report.*

11.2 Program Development

The Construction Site Program and Construction Site Inspection Program (Construction Program) was developed by first reviewing existing practices performed by the Permittees. These practices may be implemented specifically for the MS4 permit program, or may be implemented primarily to meet other objectives. In either case, they are considered part of the overall Construction Program.

New measures were then identified, if needed, to meet the specific program requirements as outlined in the permit.

The Construction Program includes BMPs that fit within the pollution prevention and onsite controls portions of the overall SWMP management plan framework depicted in **Figure 3-9**. The measures to accomplish this goal could be structural or non-structural.

11.3 Proposed Best Management Practices

Table 11-1 lists the proposed BMPs for the Construction Program. The status of the proposed BMPs are shown in the final column of **Table 11-1**, to indicate whether the BMP is an existing program, existing program with planned enhancements based on the MS4 permit renewal, or a new program that is a result of the MS4 permit renewal. Descriptions of each BMP are provided in **Appendix B**.

Table 11-2 lists the Construction Program permit elements and the proposed BMPs. Discussion of how the proposed measures meet the specific requirements for the Construction Program are provided in the following subsections.

Table 11-1. Proposed BMPs for the Construction Site Program

Measure Type	ID No.	Proposed BMP	Status
Source Control	SC-20	Construction Site BMP Guidance Manual	Existing Program
Source Control	SC-21	Construction Site Inspections	Existing Program Enhancement
Source Control	SC-22	Construction Site Training Workshops	Existing Program

Table 11-2. Construction Site Program for the Las Vegas Valley

MS4 Permit Section	MS4 Permit Requirements	Proposed Measures
IV.I.1.a	A description of procedures for notifying developers and operators of properties of one (1) acre or more (and less than one acre if part of a larger plan of development) of requirements applicable to stormwater runoff	SC-20 – Construction Site BMP Guidance Manual provides requirements
IV.I.1.b	A description of nonstructural and structural BMPs to be utilized for construction sites	SC-20 – Construction Site BMP Guidance Manual
IV.I.1.c	A description of appropriate educational and training measures for construction site operators	SC-20 – Construction Site BMP Guidance Manual SC-22 – Construction Site Training Workshops
IV.I.1.d	A description of a procedure to check for coverage under NDEP's General Construction Permit for Construction Activity prior to permit issuance	SC-20 – Construction Site BMP Guidance Manual provides requirements
IV.J.1	Each permittee shall conduct construction site inspections for compliance with its local ordinances (grading, stormwater, etc.) and permits (construction, grading, etc.)	SC-21 – Construction Site Inspections
IV.J.2	Each permittee shall inspect at least monthly, all construction sites within its jurisdiction meeting specified criteria	SC-21 – Construction Site Inspections
IV.J.3	Based upon site inspection findings, each permittee shall implement all follow-up actions (i.e., re-inspection or enforcement) necessary to comply with this Permit	SC-21 – Construction Site Inspections
IV.J.4	Inspections of construction sites shall include, specified criteria	SC-21 – Construction Site Inspections
IV.J.5	The Permittees shall track the number of inspections for the inventoried construction sites throughout the reporting period to verify that the sites are inspected at the minimum frequencies required. This information shall be included in the Annual Report.	See Section 11.3.3.5

11.3.1 Permit Sections IV.I and IV.J – Construction Site BMPs and Inspections

Section *IV.I* of the MS4 Permit requires the Permittees to implement and maintain structural and non-structural BMPs to reduce pollutants in stormwater runoff from construction sites to the MS4. Section *IV.J* of the MS4 Permit requires the Permittees to implement a construction inspection program. The following subsections detail the components for the Construction Site BMPs and Inspection Programs.

11.3.2 Permit Sections IV.I.1 – Construction Site BMPs

The following subsections describe the program to implement BMPs for construction sites.

11.3.2.1 Permit Sections IV.I.1.a – Notifying Developers and Operators

Section *IV.I.1.a* of the MS4 Permit requires the Permittees to notify developers of properties of 1.0 acre or more, or smaller if part of a larger plan of development, of the requirements to comply with all State and local construction site stormwater permitting programs. Emphasis is on notifying

developers of the need to obtain a general stormwater construction permit from NDEP. Permittees will adhere to the developer notification program, consisting of:

- Standard comment on Grading Permit or Drainage Study review letter notifying developer of need for NDEP General Construction Permit.
- Standard general condition for construction plans or specifications requiring owner/contractor to obtain NDEP General Construction Permit.
- Grading plan submittals must include Construction Permit Submittal Checklist (included in the *Las Vegas Valley Construction Site Best Management Practices Guidance Manual*), Notice of Intent (NOI) for State General Construction Permit or letter of authorization from NDEP.

11.3.2.2 Permit Sections IV.I.1.b – BMPs for Construction Sites

Section *IV.I.1.b* of the MS4 Permit requires the Permittees to describe nonstructural and structural BMPs to be utilized for construction sites.

The existing *Las Vegas Valley Construction Site Best Management Practices Guidance Manual* (BMP SC-20) describes the construction site runoff management program and provides non-structural and structural BMP implementation guidance. The manual provides guidance on selecting and designing construction site BMPs that are suitable to the unique environment and conditions in Las Vegas Valley.

Table 11-3 shows a list of the various BMPs that are described in the *Construction Site BMP Guidance Manual*. The *Construction Site BMP Guidance Manual* is available to contractors, engineers, and other construction professionals on the CCRFCD website and on the www.lvstormwater.com website. The manual will be updated by CCRFCD as needed to incorporate new BMPs appropriate for the region and modify selection or design criteria for existing BMPs as more local experience is obtained.

The *Nevada Contractors Field Guide for Construction Site BMPs*, prepared by the Truckee Meadows MS4 group and funded in part by CCRFCD, is available in hardcopy form to contractors, engineers and other construction professionals. Copies are available at Permittees' permit counters, contractor training workshops, and other venues.

11.3.2.3 Permit Sections IV.I.1.c – Contractor Education and Training Measures

Section *IV.I.1.c* of the MS4 Permit requires the Permittees to provide a description of the appropriate educational and training measures for construction site operators.

As described in SC-22 Construction Site Training Workshops, Permittees will host Contractor Training Workshops a minimum of once per year. The number of annual workshops will be tailored to the current level of interest and need. Workshops will address State and local construction permitting requirements, BMP requirements, and inspection programs. As in the past, the workshops will be conducted jointly by the Permittees and NDEP.

Table 11-3. BMPs Described in Las Vegas Valley Construction Site BMP Guidance Manual

BMP ID	Construction Site BMPs	Structural Vs. Nonstructural
Construction Site Planning	Site Design	Nonstructural
	Scheduling	Nonstructural
	Phased Construction	Nonstructural
	Topsoil Reuse	Nonstructural
	Employee Training	Nonstructural
Construction Site Erosion Control	Erosion Control Mats	Structural
	Mulching	Structural
	Protection of Trees and Vegetation in Construction Areas	Structural
	Pipe Slope Drains	Structural
Construction Site Erosion Control (continued)	Stabilized Construction Entrance	Structural
	Construction Road Stabilization	Structural
	Dust Control	Structural
	Temporary Access Waterway Crossing	Structural
	Diversion Dikes	Structural
	Drainage Swales	Structural
	Outlet Protection, Velocity Dissipation Devices	Structural
	Surface Roughening	Structural
Construction Site Sediment And Pollution Control	Organic Filter Barrier	Structural
	Sand Bag Barrier	Structural
	Gravel Filter Berms	Structural
	Check Dams	Structural
	Silt Fence	Structural
	Revegetation and Landscape Buffers	Structural
	Storm Drain Inlet Protection	Structural
	Temporary Sediment Basins	Structural
	Temporary Sediment Traps	Structural
	Sediment Dewatering Operations	Structural
	Construction Entrance/Exit Tire Wash	Structural
Construction Site General House Keeping	Chemical Management	Nonstructural
	Solid Waste Management	Nonstructural
	Equipment Maintenance Procedures	Nonstructural
	Designated Washdown Areas	Nonstructural
	Spill Containment Plan	Nonstructural
	Road Sweeping/Trackout Cleaning	Nonstructural

11.3.2.4 Permit Sections IV.I.1.d – Coverage under NDEP's General Construction Permit

Section IV.I.1.d of the MS4 Permit requires the Permittees to provide a description of the procedure to check for coverage under NDEP's General Construction Permit for Construction Activity prior to permit issuance. Permittees will conditionally issue grading and construction permits on proof of fee payment and coverage under the State's general permit for construction activity. As described in the procedures for notifying developers and operators, a grading plan submittal requires a copy of the Notice of Intent (NOI) for State General Construction Permit or letter of authorization from NDEP.

11.3.3 Permit Sections IV.J – Construction Site Inspections

The following subsections describe the program to implement inspections for construction sites.

11.3.3.1 Permit Sections IV.J.1 – Construction Site Inspection Program

Section *IV.J.1* of the MS4 Permit requires the Permittees to conduct construction site inspections for compliance with its local ordinances and permits.

Each municipal Permittee adopted a stormwater management ordinance in 2008 that includes regulatory authority to implement and enforce the provisions of their local construction site programs. These ordinances are based on EPA's model ordinance and apply to construction on sites with an area of 1.0 acre or greater.

The BMP SC-21 Construction Site Inspections satisfies this requirement. Each municipal Permittee will conduct construction site inspections for compliance with its local ordinances and permits. Each Permittee will use existing inspection staff to perform all construction site inspections. This process and schedule for each entity is summarized as follows.

- **CLV** – Offsite Inspection and Testing inspectors will inspect private development projects. CLV Construction Management personnel will inspect public construction projects. Stormwater inspections will occur during normal grading, offsite inspections.
- **CNLV** – Offsite Department inspectors will perform inspection and enforcement activities. Stormwater inspections will occur during normal grading, offsite inspections.
- **CoH** – Building Department, Public Works Department, and Quality Control Division inspectors will perform inspections. Stormwater inspections will occur during normal grading, offsite and building inspections.
- **Clark County** – Development Services personnel will perform inspection and enforcement activities. Stormwater inspections will occur during active normal grading, offsite and building inspections. In addition, air quality inspectors have been trained in the past to perform stormwater inspections, and will report any apparent problems possible violations during their normal air quality inspections.

11.3.3.2 Permit Sections IV.J.2 – Construction Site Inspections

Section *IV.J.1* of the MS4 Permit requires the Permittees to inspect, at least monthly, all construction sites within its jurisdiction that meet the criteria set forth on section *IV.J.2.a* through *IV.J.2.c* of the MS4 Permit. Each municipal Permittee will conduct the following inspections:

- All sites disturbing 100 acres or more at one time will be inspected at least monthly (par. *IV.J.2.a*).
- All sites disturbing more than 1.0 acre that are tributary to a water body segment impaired for sediment or turbidity as determined through the State's Clean Water Act 303(d) listing process will be inspected at least monthly (par. *IV.J.2.b*). Currently,

no water bodies or stream segments in Las Vegas Valley are listed as impaired for sediment or turbidity (see *Technical Memorandum II.1 Stormwater Contribution to Impaired Waters and TMDLs in Las Vegas Valley*, MWH, 2010). In the future, if any stream segments become impaired for sediment or turbidity in the Las Vegas Valley, the proposed inspection procedures in this section will apply. The Permittees will interpret the permit language “sites... that are tributary to a CWA section 303(d) water body segment” to mean a construction site that is “directly tributary” (i.e., discharges directly to) the impaired water body segment. For example, if the segment of Las Vegas Wash upstream of the wastewater treatment plant discharges became impaired for sediment or turbidity, and a new construction site drains directly into that waterway, the construction site would be considered “tributary to” the impaired water body and would come under this permit requirement.

- All sites determined by the Permittees as “a significant threat to water quality” will be inspected at least monthly (par. IV.J.2.c). The Permittees considered a number of factors in determining whether certain construction sites could present a significant threat to water quality. These included soil erosion potential, site slope, project size, project type, sensitivity of receiving waters, proximity of receiving waters, and current impairment of receiving waters for sediment and turbidity. It was determined that the infrequency and low volume of rainfall in Las Vegas Valley, combined with the high background erosion and sediment transport conditions in the desert environment, does not warrant special treatment for any construction sites beyond those already listed in the foregoing paragraphs.
- All construction sites greater than 1.0 acre not listed in Permit Section IV.J.2 will be inspected at least two times during the period of ground disturbance activities, as long as this period is longer than four months.

11.3.3.3 Permit Sections IV.J.3 – Construction Site Inspections Follow-Up Actions

Section IV.J.3 of the MS4 Permit requires that the Permittees implement all follow-up actions necessary to comply with the permit. Each municipal Permittee will implement follow-up actions, based upon site inspection findings, necessary to comply with their local stormwater ordinances and with the MS4 Permit. Resolution of infractions will be verified by repeat inspections at a frequency established by each Permittee. Failure to resolve minor infractions or observance of major violations (e.g. active discharges) will result in immediate and progressively increasing enforcement action including suspension of further inspections, stop work orders and fines. Failure to resolve issues and egregious neglect for compliance may result in notification of State representatives, whereby compliance pressure can be further asserted. Each Permittee has an established appeals process if a contractor feels enforcement actions are inappropriate. Appeals are first to the inspector’s supervisor and could ultimately rest with each jurisdiction’s governing board.

11.3.3.4 Permit Sections IV.J.4 – Construction Site Inspection Requirements

Section IV.J.4 of the MS4 Permit requires that the Permittees inspections include the items listed in Permit Sections IV.J.4.a through IV.J.4.e. The Permittees construction site inspections will consist of the following activities.

- Assess compliance with Permittee stormwater ordinances.
- Verify proper implementation and maintenance of minimum BMPs.
- Assess potential BMP effectiveness.
- Conduct visual observations for non-stormwater discharges, potential illicit connections, and the potential to discharge pollutants to the MS4.
- Provide education and outreach materials to contractor personnel on stormwater pollution prevention and the MS4 and NDEP construction permit processes, as needed.
- Prepare a written or electronic inspection record.

These inspection items will be documented by using a Construction Site Inspection Checklist, which is included in the Las Vegas Valley Construction Site Best Management Practices Guidance Manual.

Supported by the ordinance language, construction sites will be inspected not only for active discharges to the MS4 but also for the potential to discharge (i.e., absence of or poorly installed and maintained BMPs), effective waste management onsite, and effective erosion and sediment control practices. Every effort will be made to resolve minor infractions through close coordination between the inspector and the site operator. The objective of the program will be education and compliance rather than punishment. Inspectors have the authority to review the Stormwater Pollution Prevention Plans (SWPPPs) required by NDEP's general construction permit if site conditions warrant; however, this is not a required aspect of every inspection.

11.3.3.5 Construction Site Inspection Tracking

Section *IV.J.5* of the MS4 Permit requires that the Permittees track the number of inspections for construction sites throughout the reporting period (i.e., the MS4 permit year) to verify that the sites are inspected at the minimum frequencies required. Each Permittee will track the number of inspections for construction sites and the results will be included in the Annual Report. Records of inspections will be retained by the Permittees, and will be provided to NDEP upon request.

11.4 Responsibility for Implementation

Table 11-4 shows the entity responsible for implementing each proposed BMP. In most cases the local entities (Clark County, CLV, CNLV and CoH) are responsible for providing staff, equipment and other financial resources to implement the measures. Regional activities common to all Permittees are sometimes the responsibility of CCRFCD (e.g., public outreach and education), and sometimes the responsibility of others.

**Table 11-4. Construction Program Responsible Parties,
Monitoring and Tracking, and Measurable Goals**

Best Management Practice	Responsible Parties	Monitoring and Tracking Information	Measurable Goals
SC-20 – Construction Site BMP Guidance Manual	CCRFGD Clark County CLV CNLV CoH	Report changes made to manual	Review BMP Manual annually for need to update
SC-21 – Construction Site Inspections	Clark County CLV CNLV CoH	Number of inspections performed Number of enforcement actions taken	Inspect 100% of all construction sites >1.0 acre per entity policies Follow-up on 100% of all potential violations per entity policies
SC-22 – Construction Site Training Workshops	CCRFGD Clark County CLV CNLV CoH	Number of attendees at contractor training workshops	Conduct minimum of one contractor training workshop annually

11.5 Monitoring and Tracking

The Permittees propose to monitor and track certain key elements of the Construction Site Program, and report progress annually in the Annual Report. These elements are shown in **Table 11-4**.

11.6 Measurable Goals

Table 11-4 lists measurable goals proposed for the Construction Site Program. Most goals are numerical and measurable; where this was not possible, narrative goals are proposed.

Goals for existing activities are the same goals that have been part of the previous SWMP for the past several years or through the regional implementation entity. The levels of the existing programs have been effective in managing impacts of construction sites on the MS4.

11.7 Implementation Schedule

Table 11-5 presents the implementation schedule for the proposed Construction Site Program measures. Most of the measures are existing activities that are being continuously implemented by the Permittees. In accordance with the requirement of the new MS4 permit, all program measures will be fully implemented within two years of approval of the SWMP by NDEP.

Table 11-5. Implementation Schedule for Construction Site Program Measures

Best Management Practice	Required Implementation Activities and Time Period after SWMP Approval
SC-20 - Construction Site BMP Guidance Manual	Existing Practice
SC-21 - Construction Site Inspections	Plan for inspecting >100 ac and critical sites – 12 months
SC-22 - Construction Site Training Workshops	Existing Practice

12 WATERSHED PROGRAM

This section presents a description of a program incorporating the watershed-wide measures in the Las Vegas Valley SWMP.

12.1 Permit Requirements

There is no specific MS4 permit requirement for the Watershed Program. The Permittees developed this program as a way to identify and track the watershed-based measures that were included in the SWMP to address the unique factors affecting the stormwater program in Las Vegas Valley and respond to the stakeholder direction to develop a watershed-based program. The measures in this program have broad benefits for all land development types and large land areas in Las Vegas Valley.

12.2 Program Development

The Watershed Program was developed by first reviewing existing practices performed by the Permittees that provide regional stormwater quality benefits. These practices may be implemented specifically for the MS4 permit program, or may be implemented primarily to meet other objectives. In either case, they are considered part of the overall Watershed Program. New measures were then identified, if needed, to meet the specific program requirements as outlined in the permit.

The Watershed Program includes BMPs that fit within the pollution prevention and treatment controls portions of the overall SWMP management plan framework depicted in **Figure 3-9**.

12.3 Proposed Best Management Practices

Table 12-1 lists the proposed BMPs for the Watershed Program. The status of the proposed BMPs are shown in the final column of **Table 12-1**, to indicate whether the BMP is an existing program, existing program with planned enhancements based on the MS4 permit renewal, or a new program that is a result of the MS4 permit renewal. Descriptions of each BMP are provided in **Appendix B**.

Table 12-1. Proposed BMPs for the Watershed Program

Measure Type	ID No.	Proposed BMP	Status
Source Control	SC-16	Regional Water Quality Planning	Existing Program
Treatment Control	TC-1	Regional Detention Basins	Existing Program
Treatment Control	TC-2	Regional Channel Lining	Existing Program
Treatment Control	TC-3	Las Vegas Wash Stabilization Structures	Existing Program
Treatment Control	TC-6	Regional Detention Basin Retrofit	New Program

Key elements of the Watershed Program are described as follows.

Regional water quality planning activities (SC-16 Regional Water Quality Planning) that are performed by a variety of agencies provide benefits to stormwater quality in existing and new development. SNWA, the Las Vegas Valley Watershed Advisory Committee (LVVWAC), the Las Vegas Wash Coordination Committee, and the Lake Mead Water Quality Forum are agencies or organizations formed to address regional water quality concerns, protecting and enhancing environmental resources. All of the Permittees participate in these regional planning organizations.

CCRFCFCD has developed a Flood Control Master Plan for Las Vegas Valley that presents a program for addressing existing and future flood control needs (TC-1 Regional Detention Basins). The regional detention basin approach is considered more effective in Las Vegas Valley than having a highly distributed system of small neighborhood-scale facilities due to the infrequency, randomness and localized nature of most storm events. Regional detention basins capture and regulate more runoff events than local facilities would, and concentrate the need for maintenance in fewer facilities.

The CCRFCFCD design manual requires all regional flood control channels to be stabilized in some manner (TC-2 Regional Channel Lining). Because slopes in Las Vegas Valley are generally moderate to steep, velocities are high, and soils are erodible, most channels are stabilized using concrete lining. CCRFCFCD has a preference for providing concrete lining for regional flood control channels to minimize capital costs, right-of-way requirements (when taking of developed property is involved) and maintenance costs. Some channels are stabilized using riprap, gabions, grade control structures, or grass (most often in golf courses). Concrete or other channel lining eliminates production of sediment from the previously unlined or natural channels due to scour and erosion, thereby reducing sediment loads to Las Vegas Wash and Lake Mead. As a result of the CCRFCFCD policy, very few channels within the existing developed area are unlined.

Over the past 40 years erosion in the Las Vegas Wash due to wastewater discharges and urban stormwater runoff has resulted in dramatic channel erosion and reduction in wetland areas from approximately 2,000 acres to 200 acres. In order to address this issue, the Las Vegas Wash Coordination Committee was formed in 1998 to prepare and implement a management strategy for the Las Vegas Wash. A key element of the management strategy was to construct grade control structures in the eroding sections of the Wash to stabilize erosion and support new wetlands. SNWA, through the Las Vegas Wash Coordination Committee, was delegated responsibility for this effort and has a well-funded program for stabilizing lower Las Vegas Wash through construction of a series of erosion control structures (TC-3 Las Vegas Wash Stabilization Structures).

Data shows that the regional detention basins are marginally effective at reducing many common stormwater pollutants. Because the regional detention basins are designed to reduce peaks from large flood events, in most cases small runoff events of the kind normally addressed by stormwater quality programs pass through the regional detention basins with relatively little attenuation and little removal of constituents such as nitrogen, phosphorus and heavy metals. The recommended

detention basin water quality retrofit approach is to develop a unique retrofit plan for each major watershed resulting in enough total water quality capture volume to address the runoff from new development and significant redevelopment (TC-6 Regional Detention Basin Retrofit).

12.4 Responsible for Implementation

Table 12-2 shows the entity responsible for implementing each proposed BMP. In most cases the local entities (Clark County, CLV, CNLV and CoH) are responsible for providing staff, equipment and other financial resources to implement the measures. Regional activities common to all Permittees are sometimes the responsibility of CCRFCD and sometimes the responsibility of others.

Table 12-2. Watershed Program Responsible Parties, Monitoring and Tracking, and Measurable Goals

Best Management Practice	Responsible Parties	Monitoring and Tracking Information	Measurable Goals
SC-16 – Regional Water Quality Planning	CCRFCD Clark County CLV CNLV CoH	None	Assure stormwater quality issues are represented in regional planning forums
TC1 – Regional Detention Basins	CCRFCD Clark County CLV CNLV CoH	Number of new detention basins constructed	Per CCRFCD Master Plan
TC2 – Regional Channel Lining	CCRFCD Clark County CLV CNLV CoH	Miles of new stabilized channel constructed	Per CCRFCD Master Plan
TC3 – Las Vegas Wash Stabilization Measures	SNWA	Number of LVW erosion control structures constructed	Per SNWA Master Plan
TC6 – Regional Detention Basin Retrofit	CCRFCD Clark County CLV CNLV CoH	Inventory of detention basins with water quality design Volume or weight of material removed from detention basins	Per Detention Basin Retrofit Master Plan Water quality designs for all new detention basins

12.5 Monitoring and Tracking

The Permittees propose to monitor and track certain key elements of the Watershed Program, and report progress annually in the Annual Report. These elements are shown in **Table 12-2**.

12.6 Measurable Goals

Table 12-3 lists measurable goals proposed for the Watershed Program. Most goals are numerical and measurable; where this was not possible, narrative goals are proposed.

Goals for existing activities are the same goals that have been part of the previous SWMP for the past several years or through the regional implementation entity. The levels of the existing programs have been effective in managing impacts of urban development on the MS4.

12.7 Implementation Schedule

Table 12-3 presents the implementation schedule for the proposed Watershed Program measures. Most of the measures are existing activities that are being continuously implemented by the Permittees. In accordance with the requirement of the new MS4 permit, all program measures will be fully implemented within two years of approval of the SWMP by NDEP.

Table 12-3. Implementation Schedule for Watershed Program Measures

Best Management Practice	Required Implementation Activities and Time Period after SWMP Approval
SC-16 – Regional Water Quality Planning	Existing Practice Enhancement
TC-1 – Regional Detention Basins	Existing Practice
TC-2 – Regional Channel Lining	Existing Practice
TC-3 – Las Vegas Wash Stabilization Structures	Existing Practice
TC-6 – Regional Detention Basin Retrofit	Finalize Retrofit Master Plan – 6 months Conduct Pilot Retrofit Projects – 21 months Develop Retrofit Implementation Plan – 24 months

Appendix I

Industrial Facility
Program



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APPENDIX I

INDUSTRIAL FACILITY PROGRAM

Clark County Annual Industrial Inspections
July 2011 - June 2012

Jurisdiction	Location	Date	Inspector	Result/Violation	Action Taken	Follow Up
Clark County	Grand Products Nevada Inc	7/29/2011	KH	Pass	None	No
Clark County	Kalco Lighting LLC	7/29/2011	KH	Pass	None	No
Clark County	May Manufacturing LLC (DBA Artesian Spas)	7/29/2011	KH	Minor Corrections	Corrective Action Order	Next Inspection
Clark County	CMC Economy Steel	7/29/2011	JL	Pass	None	No
Clark County	Ken's Foods Inc Las Vegas	7/29/2011	JL	Minor Corrections	Corrective Action Order	Next Inspection
Clark County	Service Rock Products Inc - Lone Mountain NV Facility	8/31/2011	JL	Minor Corrections	Corrective Action Order	Next Inspection
Clark County	Las Vegas Paving, S. Jones	8/31/2011	JL	Minor Corrections	Corrective Action Order	Next Inspection
Clark County	Service Rock Products Inc - 4th Street	8/31/2011	JL	Minor Corrections	Corrective Action Order	Next Inspection
Clark County	Rebel Oil Co Inc	10/18/2011	KH	Minor Corrections	Corrective Action Order	Next Inspection
Clark County	Haycock Petroleum	10/18/2011	KH	Pass	None	No
Clark County	Young Electric Sign Co	11/22/2011	KH	Minor Corrections	Corrective Action Order	Next Inspection
Clark County	IGT	11/22/2011	KH	Pass	None	No
Clark County	H2O Environmental (Old Location)	10/26/2011	JL	Corrections Needed	Corrective Action Order	12/1/2011
	H2O Environmental (Old Location)	1/31/2012		Site Closed	Site Closed	No
	H2O Environmental 4435 E. Colton (New)	4/19/2012		Pass	None	No
Clark County	Nevada Ready Mix Arville (4301 W. Hacienda)	12/15/2011	JL	Minor Corrections	Corrective Action Order	Next Inspection
Clark County	Sparkletts Drinking Water Corp	10/26/2011	EJ	Pass	None	No
Clark County	Phillips	11/17/2011	JL	Pass	None	No
Clark County	Tronox LLC	11/2/2011	JL	Minor Corrections	Corrective Action Order	Next Inspection
Clark County	Olin - Pioneer	11/10/2011	JL	Minor Corrections	Corrective Action Order	Next Inspection
Clark County	Saguaro Power Co	11/10/2011	JL	Pass	None	No
Clark County	Titanium Metals Corporation (Timet)	11/16/2011	JL	Minor Corrections	Corrective Action Order	Next Inspection
Clark County	Ergon Asphalt & Emulsions, Inc. (Ponderosa) - Formerly Semmaterials LP Las Vegas	1/25/2012	JL	Pass / Received No Exposure Exclusion from NDEP	None	No
Clark County	Ergon Asphalt & Emulsions Inc. (Richmar)	4/20/2012	JL	Pass	None	No
Clark County	Pro Petroleum Inc	11/30/2011	KH	Pass	None	No
Clark County	Cemex Sloan Plant #1863	4/20/2012	JL	Pass	None	No

Industrial Facilities Section 313

City of North Las Vegas
July 1st, 2011 - June 30th, 2012

Location	Address	Date	Action Taken	SIC	NAICS
Bardon Materials Gowan Asphalt	413 E Gowan	4/4/2012	None Required	2951	324121
Maxum Petroleum	4581 Eaker Street	3/20/2012	None Required	5171	424710
Masterbran Cabinets (Previously Capital Cabinet Co)	3645 Losee Road	4/5/2012	None Required	2434	337110
Firestone Building Products	4272 Corporate Center Drive	5/10/2012	None Required	3081	326113
Jensen Precast	3853 Losee Road	4/5/2012	None Required	3272	327390
Las Vegas Paving	3400 North 5th Street	3/19/2012	None Required	2951	324121
Meadow Gold Dairies	6350 E Centennial Parkway	5/7/2012	None Required	2026	311511
Metl-Span I LTD	4700 Engineers Way	5/24/2012	None Required	3448	332311
CEMEX	4001 Losee Road	4/3/2012	None Required	3273	327320
American Eagle Ready Mix	29 W Gowan	4/17/2012	None Required	3273	327320
Safety Kleen System	Donovan	3/22/2012	None Required	2891 4212 5039 7389 4213	562910 325520 562112 484220 484230 423390
Cal Portland Co. (Previously Silver State Materials)	143 W Gowan Road	4/17/2012	None Required	3273	327320
Cal Portland Co. (Previously Silver State Materials)	5910 Range Road	4/19/2012	None Required	3273	327320
Thermo Fluids Inc. Antifreeze Services	4000 Arcata Way	3/13/2012	None Required	2899	325998
Universal Urethane Inc.	4201 Lone Mountain Road	3/20/2012	None Required	3086	326150

**CITY OF LAS VEGAS STORMWATER PROGRAM
INDUSTRIAL FACILITY MONITORING AND CONTROL
FY 11/12 INDUSTRIAL STORMWATER SUMMARY**

Section 4.8 of the Clark County MS4 Permit requires monitoring and control of pollutants in stormwater discharges from these facilities:

1. Municipal landfills
 2. Hazardous waste treatment, disposal and recovery facilities
 3. Industrial facilities subject to Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986
 4. Industrial facilities that contribute a substantial pollutant loading to the MS4
-

Facilities Meeting Section 4.8 criteria during FY 11/12 and Inspection Activity

Municipal landfills

None

Hazardous waste treatment, disposal and recovery facilities

None.

Industrial facilities subject to Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (as identified via EPA's online Toxic Release Inventory)

1. Anderson Dairy
801 Searles Ave
Las Vegas, NV 89101
Inspected 10/20/11 – No stormwater violations noted.
Inspected 3/22/12 – No stormwater violations noted.
Inspected 4/12/12 – No stormwater violations noted.
Inspected 6/13/12 – No stormwater violations noted.

2. Haycock Petroleum
715 W Bonanza Rd
Las Vegas, NV 89106
Inspected 6/13/12 – No stormwater violations noted.
3. Las Vegas Finishing LLC
3261 Builders Ave
Las Vegas, NV 89101
Inspected 12/20/11 – No stormwater violations noted.
Inspected 6/13/12 – No stormwater violations noted.
Inspected 6/26/12 – No stormwater violations noted.
4. Las Vegas Paving
W Lone Mountain Rd
Las Vegas, NV
Inspected 6/13/12 – No stormwater violations noted.
5. Nevada Ready Mix
601 W Bonanza Rd
Las Vegas, NV 89106
Inspected 6/13/12 – No stormwater violations noted.
6. Southern Nevada Paving Summerlin Asphalt Plant
I-215 & Summerlin Pkwy
Las Vegas, NV 89145
Inspected 6/13/12 – Facility still shut down. No stormwater violations noted.

Industrial facilities that contribute a substantial pollutant loading to the MS4

None

Other Industrial Stormwater Inspection Activity during FY 11/12

The following is a summary of inspections pertaining to stormwater-related provisions in Chapter 14.18 of the Las Vegas Municipal Code during routine inspections at industrial and commercial facilities that the Environmental Compliance Section normally inspects for compliance with non-domestic discharges to the sanitary sewer. The following also summarizes stormwater-related complaint calls associated with industrial (or residential) activity, when applicable under LVMC 14.18.

Class I Wastewater Contribution Permittees

22 stormwater inspections were performed at Class I permitted facilities during the course of routine Environmental Compliance Section wastewater inspections. All stormwater issues that were discovered have been satisfactorily resolved.

Class II Wastewater Contribution Permittees

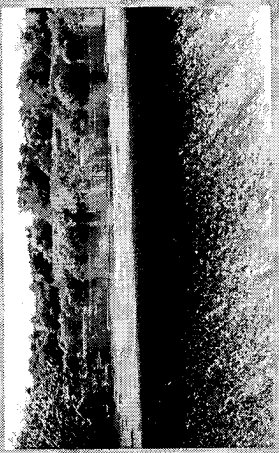
54 stormwater inspections were performed at Class II permitted facilities during the course of routine Environmental Compliance Section wastewater inspections. All stormwater issues that were discovered have been satisfactorily resolved.

Complaint Calls

44 stormwater-related complaint calls were responded to by the Environmental Compliance Section. All stormwater issues that were discovered have been satisfactorily resolved.

Grease Interceptor Inspections

50 grease interceptor inspections were performed by the Environmental Compliance Section. All stormwater issues that were discovered have been satisfactorily resolved.



3010 West Charleston
Las Vegas, Nevada 89102
Phone: 702.878.8010
Fax: 702.878.7833



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